BP PRODUCTS NORTH AMERICA, INC.
801 EAST ORDNANCE ROAD
BALTIMORE, MARYLAND 21226
PART 70 OPERATING PERMIT NO. 24-003-0309

SECTION I SOURCE IDENTIFICATION

1. DESCRIPTION OF FACILITY

BP Products North America Inc., Curtis Bay Terminal (BP) owns and operates a petroleum bulk storage and transfer facility located at 801 East Ordnance Road, Baltimore, Maryland.

The major activities at the facility include warehousing and storage of bulk petroleum products. The primary sources of air emissions at the facility include eight (8) bulk petroleum storage tanks, seventeen (17) smaller storage tanks (additive, slop, butane, fuel oil storage, etc.), a five lane truck loading rack, one (1) carbon adsorption/absorption vapor recovery unit (VRU), and one (1) vapor combustion unit (VCU).

The facility is located in an ozone non-attainment area in Anne Arundel County. The primary standard industrial classification (SIC) code for this terminal is 5171.

2. FACILITY INVENTORY LIST

All of the following emission units are registered under ARMA Registration No. 003-0309-9-0029.

Emissions Unit Number	Emissions Unit Name and Description	Date of Installation
EU-207L	One (1) 691,812-gallon distillate storage tank equipped with a cone roof.	1969
EU-208M	One (1) 3,200,689-gallon, gasoline storage tank equipped with an internal floating roof with a vapor mounted primary seal and a secondary wiper seal.	1926
EU-212Q	One (1) 3,342,053-gallon, gasoline storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a liquid mounted primary seal and a secondary wiper seal.	1961
EU-213R	One (1) 3,335,066-gallon, gasoline storage tank equipped with a steel pan internal floating roof with a liquid mounted primary seal and a secondary wiper seal.	1995

EU-214S	One (1) 3,248,243-gallon, gasoline storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a liquid mounted primary seal and a secondary wiper seal.	1929
EU-215T	One (1) 2,989,433-gallon, gasoline storage tank equipped with an internal floating roof with a liquid mounted primary seal and a secondary wiper seal.	1930
EU-217V	One (1) 2,974,134-gallon, gasoline storage swing tank equipped with an internal floating roof with a liquid mounted primary seal and a secondary wiper seal.	1930, modified in 1998 for gasoline service.
EU-218W	One (1) 3,111,005-gallon ethanol storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a liquid mounted primary seal and a secondary wiper seal.	1931, modified in 2006 for ethanol storage.
EU-LR	A five lane loading rack controlled primarily by a John Zink vapor recovery unit (VRU). A John Zink vapor combustion unit (VCU) is used for back-up control.	1989, modified in 2006 and 2011.
EU-7	One (1) 300-gallon, fuel additive, horizontal storage tank.	2001
EU-8	One (1) 225-gallon sample return tank associated with the butane blending system. Note: this emission unit was previously for one (1) 300-gallon, fuel additive, horizontal storage tank.	2011
EU-9	One (1) 2,000-gallon, fuel additive, horizontal storage tank.	Unknown
EU-10	One (1) 8,000-gallon, fuel additive, horizontal storage tank.	1973
EU-11	One (1) 8,000-gallon, fuel additive, horizontal storage tank.	1973
EU-12	One (1) 60,000-gallon pressurized butane bullet. Note: EU-12 was previously a 12,000-gallon, slop refined petroleum products, horizontal storage tank which was taken out of service in 1999 and demolished in August of 2011.	2011
EU-13	One (1) 2,000-gallon, slop refined petroleum products, horizontal storage tank.	1997
EU-14	One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.	Unknown

EU-15	One (1) 10,000-gallon, fuel additive, horizontal storage tank.	Unknown
EU-16	One (1) 10,000-gallon, fuel additive, horizontal storage tank.	Unknown
EU-17	One (1) 8,000-gallon, fuel additive, horizontal storage tank.	Unknown
EU-18	One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.	Unknown
EU-19	One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.	Unknown
EU-20	One (1) 550-gallon, heating oil, horizontal storage tank.	2001
EU-23	One (1) 4,500-gallon, slop refined ethanol, horizontal storage tank.	2006
EU-24	One (1) 300-gallon, fuel additive, horizontal storage tank.	Unknown
EU-25	One (1) 550-gallon, fuel additive, horizontal storage tank.	Unknown
EU-26	One (1) 4,300-gallon, fuel additive, horizontal storage tank.	2004

Note: EU-7, 8, 9, 12, 13, 14, 18, 19, 20, 24, 25, and 207L are listed in the insignificant activities section.

SECTION II GENERAL CONDITIONS

1. DEFINITIONS

[COMAR 26.11.01.01] and [COMAR 26.11.02.01]

The words or terms in this Part 70 permit shall have the meanings established under COMAR 26.11.01 and .02 unless otherwise stated in this permit.

2. ACRONYMS

ARMA	Air and Radiation Management Administration
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEM	Continuous Emissions Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMAR	Code of Maryland Regulations
EPA	United States Environmental Protection Agency
FR	Federal Register
gr	grains
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
MDE	Maryland Department of the Environment
MVAC	Motor Vehicle Air Conditioner
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
OTR	Ozone Transport Region
PM	Particulate Matter
PM10	Particulate Matter with Nominal Aerodynamic Diameter of 10 micrometers or less
ppm	parts per million
ppb	parts per billion
PSD	Prevention of Significant Deterioration
PTC	Permit to construct
PTO	Permit to operate (State)
SIC	Standard Industrial Classification
SO_2	Sulfur Dioxide

TAP	Toxic Air Pollutant
tpy	tons per year
VE	Visible Emissions
VOC	Volatile Organic Compounds

3. EFFECTIVE DATE

The effective date of the conditions in this Part 70 permit is the date of permit issuance, unless otherwise stated in the permit.

4. PERMIT EXPIRATION

[COMAR 26.11.03.13B(2)]

Upon expiration of this permit, the terms of the permit will automatically continue to remain in effect until a new Part 70 permit is issued for this facility provided that the Permittee has submitted a timely and complete application and has paid applicable fees under COMAR 26.11.02.16.

Otherwise, upon expiration of this permit the right of the Permittee to operate this facility is terminated.

5. PERMIT RENEWAL

[COMAR 26.11.03.02B(3)] and [COMAR 26.11.03.02E]

The Permittee shall submit to the Department a completed application for renewal of this Part 70 permit at least 12 months before the expiration of the permit. Upon submitting a completed application, the Permittee may continue to operate this facility pending final action by the Department on the renewal.

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information no later than 10 days after becoming aware that this occurred. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a completed application was submitted, but prior to the release of a draft permit. This information shall be submitted to the Department no later than 20 days after a new requirement has been adopted.

6. CONFIDENTIAL INFORMATION

[COMAR 26.11.02.02G]

In accordance with the provisions of the State Government Article, Sec. 10-611 et seq., Annotated Code of Maryland, all information submitted in an application shall be considered part of the public record and available for inspection and copying, unless the Permittee claims that the information is confidential when it is submitted to the Department. At the time of the request for inspection or copying, the Department will make a determination with regard to the confidentiality of the information. The Permittee, when requesting confidentiality, shall identify the information in a manner specified by the Department and, when requested by the Department, promptly provide specific reasons supporting the claim of confidentiality. Information submitted to the Department without a request that the information be deemed confidential may be made available to the public. Subject to approval of the Department, the Permittee may provide a summary of confidential information that is suitable for public review. The content of this Part 70 permit is not subject to confidential treatment.

7. PERMIT ACTIONS

[COMAR 26.11.03.06E(3)] and [COMAR 26.11.03.20(A)]

This Part 70 permit may be revoked or reopened and revised for cause. The filing of an application by the Permittee for a permit revision or renewal; or a notification of termination, planned changes or anticipated noncompliance by the facility, does not stay a term or condition of this permit.

The Department shall reopen and revise, or revoke the Permittee's Part 70 permit under the following circumstances:

a. Additional requirements of the Clean Air Act become applicable to this facility and the remaining permit term is 3 years or more;

b. The Department or the EPA determines that this Part 70 permit contains a material mistake, or is based on false or inaccurate information supplied by or on behalf of the Permittee;

c. The Department or the EPA determines that this Part 70 permit must be revised or revoked to assure compliance with applicable requirements of the Clean Air Act; or

d. Additional requirements become applicable to an affected source under the Federal Acid Rain Program.

8. PERMIT AVAILABILITY

[COMAR 26.11.02.13G]

The Permittee shall maintain this Part 70 permit in the vicinity of the facility for which it was issued, unless it is not practical to do so, and make this permit immediately available to officials of the Department upon request.

9. REOPENING THE PART 70 PERMIT FOR CAUSE BY THE EPA

[COMAR 26.11.03.20B]

The EPA may terminate, modify, or revoke and reissue a permit for cause as prescribed in 40 CFR §70.7(g)

10. TRANSFER OF PERMIT

[COMAR 26.11.02.02E]

The Permittee shall not transfer this Part 70 permit except as provided in COMAR 26.11.03.15.

11. REVISION OF PART 70 PERMITS – GENERAL CONDITIONS

[COMAR 26.11.03.14] and [COMAR 26.11.03.06A(8)]

a. The Permittee shall submit an application to the Department to revise this Part 70 permit when required under COMAR 26.11.03.15 -.17.

b. When applying for a revision to a Part 70 permit, the Permittee shall comply with the requirements of COMAR 26.11.03.02 and .03 except that the application for a revision need include only information listed that is related to the proposed change to the source and revision to

the permit. This information shall be sufficient to evaluate the proposed change and to determine whether it will comply with all applicable requirements of the Clean Air Act.

c. The Permittee may not change any provision of a compliance plan or schedule in a Part 70 permit as an administrative permit amendment or as a minor permit modification unless the change has been approved by the Department in writing.

d. A permit revision is not required for a change that is provided for in this permit relating to approved economic incentives, marketable permits, emissions trading, and other similar programs.

12. SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS

[COMAR 26.11.03.17]

The Permittee may apply to the Department to make a significant modification to its Part 70 Permit as provided in COMAR 26.11.03.17 and in accordance with the following conditions:

a. A significant modification is a revision to the federally enforceable provisions in the permit that does not qualify as an administrative permit amendment under COMAR 26.11.03.15 or a minor permit modification as defined under COMAR 26.11.03.16.

b. This permit does not preclude the Permittee from making changes, consistent with the provisions of COMAR 26.11.03, that would make the permit or particular terms and conditions of the permit irrelevant, such as by shutting down or reducing the level of operation of a source or of an emissions unit within the source. Air pollution control equipment shall not be shut down or its level of operation reduced if doing so would violate any term of this permit.

c. Significant permit modifications are subject to all requirements of COMAR 26.11.03 as they apply to permit issuance and renewal, including the requirements for applications, public participation, and review by affected states and EPA, except:

(1) An application need include only information pertaining to the proposed change to the source and modification of this permit, including a description of the change and modification, and any

new applicable requirements of the Clean Air Act that will apply if the change occurs;

(2) Public participation, and review by affected states and EPA, is limited to only the application and those federally enforceable terms and conditions of the Part 70 permit that are affected by the significant permit modification.

d. As provided in COMAR 26.11.03.15B(5), an administrative permit amendment may be used to make a change that would otherwise require a significant permit modification if procedures for enhanced preconstruction review of the change are followed that satisfy the requirements of 40 CFR 70.7(d)(1)(v).

e. Before making a change that qualifies as a significant permit modification, the Permittee shall obtain all permits-to-construct and approvals required by COMAR 26.11.02.

f. The Permittee shall not make a significant permit modification that results in a violation of any applicable requirement of the Clean Air Act.

g. The permit shield in COMAR 26.11.03.23 applies to a final significant permit modification that has been issued by the Department, to the extent applicable under COMAR 26.11.03.23.

13. MINOR PERMIT MODIFICATIONS

[COMAR 26.11.03.16]

The Permittee may apply to the Department to make a minor modification to the federally enforceable provisions of this Part 70 permit as provided in COMAR 26.11.03.16 and in accordance with the following conditions:

a. A minor permit modification is a Part 70 permit revision that:

(1) Does not result in a violation of any applicable requirement of the Clean Air Act;

(2) Does not significantly revise existing federally enforceable monitoring, including test methods, reporting, record keeping, or compliance certification requirements except by:

(a) Adding new requirements,

(b) Eliminating the requirements if they are rendered meaningless because the emissions to which the requirements apply will no longer occur, or

(c) Changing from one approved test method for a pollutant and source category to another;

(3) Does not require or modify a:

(a) Case-by-case determination of a federally enforceable emissions standard,

(b) Source specific determination for temporary sources of ambient impacts, or

(c) Visibility or increment analysis;

(4) Does not seek to establish or modify a federally enforceable permit term or condition for which there is no corresponding underlying applicable requirement of the Clean Air Act, but that the Permittee has assumed to avoid an applicable requirement to which the source would otherwise be subject, including:

(a) A federally enforceable emissions standard applied to the source pursuant to COMAR 26.11.02.03 to avoid classification as a Title I modification; and

(b) An alternative emissions standard applied to an emissions unit pursuant to regulations promulgated under Section 112(i)(5) of the Clean Air Act

(5) Is not a Title I modification; and

(6) Is not required under COMAR 26.11.03.17 to be processed as a significant modification to this Part 70 permit.

b. Application for a Minor Permit Modification

The Permittee shall submit to the Department an application for a minor permit modification that satisfies the requirements of COMAR 26.11.03.03 which includes the following:

(1) A description of the proposed change, the emissions resulting from the change, and any new applicable requirements that will apply if the change is made;

(2) The proposed minor permit modification;

(3) Certification by a responsible official, in accordance with COMAR 26.11.02.02F, that:

(a) The proposed change meets the criteria for a minor permit modification, and

(b) The Permittee has obtained or applied for all required permits-to-construct required by COMAR 26.11.03.16 with respect to the proposed change;

(4) Completed forms for the Department to use to notify the EPA and affected states, as required by COMAR 26.11.03.07-.12.

c. Permittee's Ability to Make Change

(1) For changes proposed as minor permit modifications to this permit that will require the applicant to obtain a permit to construct, the permit to construct must be issued prior to the new change.

(2) During the period of time after the Permittee applies for a minor modification but before the Department acts in accordance with COMAR 26.11.03.16F(2):

(a) The Permittee shall comply with applicable requirements of the Clean Air Act related to the change and the permit terms and conditions described in the application for the minor modification.

(b) The Permittee is not required to comply with the terms and conditions in the permit it seeks to modify. If the Permittee fails to comply with the terms and conditions in the application during this time, the terms and conditions of both this permit and the application for modification may be enforced against it.

d. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.16 is not within the scope of this regulation.

e. Minor permit modification procedures may be used for Part 70 permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, but only to the extent that the minor permit modification procedures are explicitly provided for in regulations approved by the EPA as part of the Maryland SIP or in other applicable requirements of the Clean Air Act.

14. ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS

[COMAR 26.11.03.15]

The Permittee may apply to the department to make an administrative permit amendment as provided in COMAR 26.11.03.15 and in accordance with the following conditions:

a. An application for an administrative permit amendment shall:

(1) Be in writing;

(2) Include a statement certified by a responsible official that the proposed amendment meets the criteria in COMAR 26.11.03.15 for an administrative permit amendment, and

(3) Identify those provisions of this part 70 permit for which the amendment is requested, including the basis for the request.

b. An administrative permit amendment:

(1) Is a correction of a typographical error;

(2) Identifies a change in the name, address, or phone number of a person identified in this permit, or a similar administrative change involving the Permittee or other matters which are not directly related to the control of air pollution;

(3) requires more frequent monitoring or reporting by the Permittee;

(4) Allows for a change in ownership or operational control of a source for which the Department determines that no other revision to the permit is necessary and is documented as per COMAR 26.11.03.15B(4);

(5) Incorporates into this permit the requirements from preconstruction review permits or approvals issued by the Department in accordance with COMAR 26.11.03.15B(5), but only if it satisfies 40 CFR 70.7(d)(1)(v);

(6) Incorporates any other type of change, as approved by the EPA, which is similar to those in COMAR 26.11.03.15B(1)—(4);

(7) Notwithstanding COMAR 26.11.03.15B(1)—(6), all modifications to acid rain control provisions included in this Part 70 permit are governed by applicable requirements promulgated under Title IV of the Clean Air Act; or

(8) Incorporates any change to a term or condition specified as State-only enforceable, if the Permittee has obtained all necessary permits-to-construct and approvals that apply to the change.

c. The Permittee may make the change addressed in the application for an administrative amendment upon receipt by the Department of the application, if all permits-to-construct or approvals otherwise required by COMAR 26.11.02 prior to making the change have first been obtained from the Department.

d. The permit shield in COMAR 26.11.03.23 applies to administrative permit amendments made under Section B(5) of COMAR 26.11.03.15, but only after the Department takes final action to revise the permit.

e. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.15 is not within the scope of this regulation.

15. OFF-PERMIT CHANGES TO THIS SOURCE

[COMAR 26.11.03.19]

The Permittee may make off-permit changes to this facility as provided in COMAR 26.11.03.19 and in accordance with the following conditions:

a. The Permittee may make a change to this permitted facility that is not addressed or prohibited by the federally enforceable conditions of this Part 70 permit without obtaining a Part 70 permit revision if:

(1) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;

(2) The change is not subject to any requirements under Title IV of the Clean Air Act;

(3) The change is not a Title I modification; and

(4) The change does not violate an applicable requirement of the Clean Air Act or a federally enforceable term or condition of the permit.

b. For a change that qualifies under COMAR 26.11.03.19, the Permittee shall provide contemporaneous written notice to the Department and the EPA, except for a change to an emissions unit or activity that is exempt from the Part 70 permit application, as provided in COMAR 26.11.03.04. This written notice shall describe the change, including the date it was made, any change in emissions, including the pollutants emitted, and any new applicable requirements of the Clean Air Act that apply as a result of the change.

c. Upon satisfying the requirements of COMAR 26.11.03.19, the Permittee may make the proposed change.

d. The Permittee shall keep a record describing:

(1) Changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement of the Clean Air Act , but not otherwise regulated under this permit; and

(2) The emissions resulting from those changes.

e. Changes that qualify under COMAR 26.11.03.19 are not subject to the requirements for Part 70 revisions.

f. The Permittee shall include each off-permit change under COMAR 26.11.03.19 in the application for renewal of the part 70 permit.

g. The permit shield in COMAR 26.11.03.23 does not apply to off-permit changes made under COMAR 26.11.03.19.

h. The Permittee is subject to enforcement action if it is determined that an off-permit change made under COMAR 26.11.03.19 is not within the scope of this regulation.

16. ON-PERMIT CHANGES TO SOURCES

[COMAR 26.11.03.18]

The Permittee may make on-permit changes that are allowed under Section 502(b)(10) of the Clean Air Act as provided in COMAR 26.11.03.18 and in accordance with the following conditions:

a. The Permittee may make a change to this facility without obtaining a revision to this Part 70 permit if:

(1) The change is not a Title I modification;

(2) The change does not result in emissions in excess of those expressly allowed under the federally enforceable provisions of the Part 70 permit for the permitted facility or for an emissions unit within the facility, whether expressed as a rate of emissions or in terms of total emissions;

(3) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;

(4) The change does not violate an applicable requirement of the Clean Air Act;

(5) The change does not violate a federally enforceable permit term or condition related to monitoring, including test methods, record keeping, reporting, or compliance certification requirements;

(6) The change does not violate a federally enforceable permit term or condition limiting hours of operation, work practices, fuel usage, raw material usage, or production levels if the term or condition has been established to limit emissions allowable under this permit;

(7) If applicable, the change does not modify a federally enforceable provision of a compliance plan or schedule in this Part 70 permit unless the Department has approved the change in writing; and

(8) This permit does not expressly prohibit the change under COMAR 26.11.03.18.

b. The Permittee shall notify the Department and the EPA in writing of a proposed on-permit change under COMAR 26.11.03.18 not later than 7 days before the change is made. The written information shall include the following information:

(1) A description of the proposed change;

(2) The date on which the change is proposed to be made;

(3) Any change in emissions resulting from the change, including the pollutants emitted;

(4) Any new applicable requirement of the Clean Air Act; and

(5) Any permit term or condition that would no longer apply.

c. The responsible official of this facility shall certify in accordance with COMAR 26.11.02.02F that the proposed change meets the criteria for the use of on-permit changes under COMAR 26.11.03.18.

d. The Permittee shall attach a copy of each notice required by condition b. above to this Part 70 permit.

e. On-permit changes that qualify under COMAR 26.11.03.18 are not subject to the requirements for part 70 permit revisions.

f. Upon satisfying the requirements under COMAR 26.11.03.18, the Permittee may make the proposed change.

g. The permit shield in COMAR 26.11.03.23 does not apply to on-permit changes under COMAR 26.11.03.18.

h. The Permittee is subject to enforcement action if it is determined that an on-permit change made under COMAR 26.11.03.18 is not within the scope of the regulation or violates any requirement of the State air pollution control law.

17. FEE PAYMENT

[COMAR 26.11.02.16A(2) & (5)(b)]

a. The fee for this Part 70 permit is as prescribed in Regulation .19 of COMAR 26.11.02.

b. The fee is due on and shall be paid on or before each 12-month anniversary date of the permit.

c. Failure to pay the annual permit fee constitutes cause for revocation of the permit by the Department.

18. REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS

[COMAR 26.11.02.09.]

The Permittee may not construct or modify or cause to be constructed or modified any of the following sources without first obtaining, and having in current effect, the specified permits-to-construct and approvals:

a. New Source Review source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;

b. Prevention of Significant Deterioration source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;

c. New Source Performance Standard source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

d. National Emission Standards for Hazardous Air Pollutants source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

e. A stationary source of lead that discharges one ton per year or more of lead or lead compounds measured as elemental lead, permit to construct required, except for generating stations constructed by electric companies;

f. All stationary sources of air pollution, including installations and air pollution control equipment, except as listed in COMAR 26.11.02.10, permit to construct required;

g. In the event of a conflict between the applicability of (a.— e.) above and an exemption listed in COMAR 26.11.02.10, the provision that requires a permit applies.

h. Approval of a PSD or NSR source by the Department does not relieve the Permittee obtaining an approval from also obtaining all permits-to-construct required b y (c.— g.) above.

19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION

[COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]

The Permittee may request the Department to authorize special procedures for the Permittee to apply simultaneously, to the extent possible, for a permit to construct and a revision to this permit.

These procedures may provide for combined public notices, informational meetings, and public hearings for both permits but shall not adversely affect the rights of a person, including EPA and affected states, to obtain information about the application for a permit, to comment on an application, or to challenge a permit that is issued.

These procedures shall not alter any existing permit procedures or time frames.

20. PROPERTY RIGHTS

[COMAR 26.11.03.06E(4)]

This Part 70 permit does not convey any property rights of any sort, or any exclusive privileges.

21. SEVERABILITY

[COMAR 26.11.03.06A(5)]

If any portion of this Part 70 permit is challenged, or any term or condition deemed unenforceable, the remainder of the requirements of the permit continues to be valid.

22. INSPECTION AND ENTRY

[COMAR 26.11.03.06G(3)]

The Permittee shall allow employees and authorized representatives of the Department, the EPA, and local environmental health agencies, upon presentation of credentials or other documents as may be required by law, to:

a. Enter at a reasonable time without delay and without prior notification the Permittee's property where a Part 70 source is located, emissions-related activity is conducted, or records required by this permit are kept;

b. Have access to and make copies of records required by the permit;

c. Inspect all emissions units within the facility subject to the permit and all related monitoring systems, air pollution control equipment, and practices or operations regulated or required by the permit; and

d. Sample or monitor any substances or parameters at or related to the emissions units at the facility for the purpose of determining compliance with the permit.

23. DUTY TO PROVIDE INFORMATION

[COMAR 26.11.03.06E(5)]

The Permittee shall furnish to the Department, within a reasonable time specified by the Department, information requested in writing by the Department in order to determine whether the Permittee is in compliance with the federally enforceable conditions of this Part 70 permit, or whether cause exists for revising or revoking the permit. Upon request, the Permittee shall also furnish to the Department records required to be kept under the permit.

For information claimed by the Permittee to be confidential and therefore potentially not discloseable to the public, the Department may require the Permittee to provide a copy of the records directly to the EPA along with a claim of confidentiality.

The Permittee shall also furnish to the Department, within a reasonable time specified by the Department, information or records requested in writing by the Department in order to determine if the Permittee is in compliance with the State-only enforceable conditions of this permit.

24. COMPLIANCE REQUIREMENTS

[COMAR 26.11.03.06E(1)] and [COMAR 26.11.03.06A(11)] and [COMAR 26.11.02.05]

The Permittee shall comply with the conditions of this Part 70 permit. Noncompliance with the permit constitutes a violation of the Clean Air Act, and/or the Environment Article Title 2 of the Annotated Code of Maryland and may subject the Permittee to:

a. Enforcement action,

b. Permit revocation or revision,

c. Denial of the renewal of a Part 70 permit, or

d. Any combination of these actions.

The conditions in this Part 70 permit are enforceable by EPA and citizens under the Clean Air Act except for the State-only enforceable conditions.

Under Environment Article Section 2-609, Annotated Code of Maryland, the Department may seek immediate injunctive relief against a person who violates this permit in such a manner as to cause a threat to human health or the environment.

25. CREDIBLE EVIDENCE

Nothing in this permit shall be interpreted to preclude the use of credible evidence to demonstrate noncompliance with any term of this permit.

26. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

[COMAR 26.11.03.06E(2)]

The need to halt or reduce activity in order to comply with the conditions of this permit may not be used as a defense in an enforcement action.

27. CIRCUMVENTION

[COMAR 26.11.01.06]

The Permittee may not install or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total weight of emissions, conceals or dilutes emissions which would otherwise constitute a violation of any applicable air pollution control regulation.

28. PERMIT SHIELD

[COMAR 26.11.03.23]

A permit shield as described in COMAR 26.11.03.23 shall apply only to terms and conditions in this Part 70 permit that have been specifically identified as covered by the permit shield. Neither this permit nor COMAR 26.11.03.23 alters the following:

a. The emergency order provisions in Section 303 of the Clean Air Act, including the authority of EPA under that section;

b. The liability of the Permittee for a violation of an applicable requirement of the Clean Air Act before or when this permit is issued or for a violation that continues after issuance;

c. The requirements of the Acid Rain Program, consistent with Section 408(a) of the Clean Air Act;

d. The ability of the Department or EPA to obtain information from a source pursuant to Maryland law and Section 114 of the Clean Air Act; or

e. The authority of the Department to enforce an applicable requirement of the State air pollution control law that is not an applicable requirement of the Clean Air Act.

29. ALTERNATE OPERATING SCENARIOS

[COMAR 26.11.03.06A(9)]

For all alternate operating scenarios approved by the Department and contained within this permit, the Permittee, while changing from one approved scenario to another, shall contemporaneously record in a log maintained at the facility each scenario under which the emissions unit is operating and the date and time the scenario started and ended.

SECTION III PLANT WIDE CONDITIONS

1. PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION

[COMAR 26.11.06.03D]

The Permittee shall not cause or permit any building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

2. OPEN BURNING

[COMAR 26.11.07]

Except as provided in COMAR 26.11.07.04, the Permittee shall not cause or permit an open fire from June 1 through August 31 of any calendar year. Prior to any open burning, the Permittee shall request and receive approval from the Department.

3. AIR POLLUTION EPISODE

[COMAR 26.11.05.04]

When requested by the Department, the Permittee shall prepare in writing standby emissions reduction plans, consistent with good industrial practice and safe operating procedures, for reducing emissions creating air pollution during periods of Alert, Warning, and Emergency of an air pollution episode.

4. REPORT OF EXCESS EMISSIONS AND DEVIATIONS

[COMAR 26.11.01.07] and [COMAR 26.11.03.06C(7)]

The Permittee shall comply with the following conditions for occurrences of excess emissions and deviations from requirements of this permit, including those in Section VI – State-only Enforceable Conditions:

a. Report any deviation from permit requirements that could endanger human health or the environment, by orally notifying the Department immediately upon discovery of the deviation;

b. Promptly report all occurrences of excess emissions that are expected to last for one hour or longer by orally notifying the Department of the onset and termination of the occurrence;

c. When requested by the Department the Permittee shall report all deviations from permit conditions, including those attributed to malfunctions as defined in COMAR 26.11.01.07A, within 5 days of the request by submitting a written description of the deviation to the Department. The written report shall include the cause, dates and times of the onset and termination of the deviation, and an account of all actions planned or taken to reduce, eliminate, and prevent recurrence of the deviation;

d. The Permittee shall submit to the Department semi-annual monitoring reports that confirm that all required monitoring was performed, and that provide accounts of all deviations from permit requirements that occurred during the reporting periods. Reporting periods shall be January 1 through June 30 and July 1 through December 31, and reports shall be submitted within 30 days of the end of each reporting period. Each account of deviation shall include a description of the deviation, the dates and times of onset and termination, identification of the person who observed or discovered the deviation, causes and corrective actions taken, and actions taken to prevent recurrence. If no deviations from permit conditions occurred during a reporting period, the Permittee shall submit a written report that so states.

e. When requested by the Department, the Permittee shall submit a written report to the Department within 10 days of receiving the request concerning an occurrence of excess emissions. The report shall contain the information required in COMAR 26.11.01.07D(2).

5. ACCIDENTAL RELEASE PROVISIONS

[COMAR 26.11.03.03B(23)] and [40 CFR 68]

The Permittee shall submit risk management plans by the date specified in 40 CFR 68.150.

The Permittee shall certify compliance with the requirements of 40 CFR 68 as part of the annual compliance certification as required by 40 CFR 70.

6. GENERAL TESTING REQUIREMENTS

[COMAR 26.11.01.04]

The Department may require the Permittee to conduct, or have conducted, testing to determine compliance with this Part 70 permit. The Department, at its option, may witness or conduct these tests. This testing shall be done at a reasonable time, and all information gathered during a testing operation shall be provided to the Department.

7. EMISSIONS TEST METHODS

[COMAR 26.11.01.04]

Compliance with the emissions standards and limitations in this Part 70 permit shall be determined by the test methods designated and described below or other test methods submitted to and approved by the Department.

Reference documents of the test methods approved by the Department include the following:

a. 40 CFR 60, appendix A

b. 40 CFR 51, appendix M

c. The Department's Technical Memorandum 91-01 "Test Methods and Equipment Specifications for Stationary Sources", (January 1991), as amended through Supplement 3, (October 1, 1997)

8. EMISSIONS CERTIFICATION REPORT

[COMAR 26.11.01.05-1] and [COMAR 26.11.02.19C] and [COMAR 26.11.02.19D]

The Permittee shall certify actual annual emissions of regulated pollutants from the facility on a calendar year basis.

a. The certification shall be on forms obtained from the Department and submitted to the Department not later than April 1 of the year following the year for which the certification is required;

b. The individual making the certification shall certify that the information is accurate to the individual's best knowledge. The individual shall be:

(1) Familiar with each source for which the certifications forms are submitted, and

(2) Responsible for the accuracy of the emissions information;

c. The Permittee shall maintain records necessary to support the emissions certification including the following information if applicable:

(1) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;

(2) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;

(3) Amounts, types and analyses of all fuels used;

(4) Emissions data from continuous emissions monitors that are required by this permit, including monitor calibration and malfunction information;

(5) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment including:

(a) Significant maintenance performed,
(b) Malfunctions and downtime, and
(c) Episodes of reduced efficiency of all equipment;

(6) Limitations on source operation or any work practice standards that significantly affect emissions; and

(7) Other relevant information as required by the Department.

9. COMPLIANCE CERTIFICATION REPORT

[COMAR 26.11.03.06G(6) and (7)]

The Permittee shall submit to the Department and EPA Region III a report certifying compliance with each term of this Part 70 permit including each applicable standard, emissions limitation, and work practice for the previous calendar year by April 1 of each year.

a. The compliance certification shall include:

(1) The identification of each term or condition of this permit which is the basis of the certification;

(2) The compliance status;

(3) Whether the compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of each source, currently and over the reporting period; and

(5) Any other information required to be reported to the Department that is necessary to determine the compliance status of the Permittee with this permit.

b. The Permittee shall submit the compliance certification reports to the Department and EPA simultaneously.

10. CERTIFICATION BY RESPONSIBLE OFFICIAL

[COMAR 26.11.02.02F]

All application forms, reports, and compliance certifications submitted pursuant to this permit shall be certified by a responsible official as to truth, accuracy, and completeness. The Permittee shall expeditiously notify the Department of an appointment of a new responsible official.

The certification shall be in the following form:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons

who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

11. SAMPLING AND EMISSIONS TESTING RECORD KEEPING

[COMAR 26.11.03.06C(5)]

The Permittee shall gather and retain the following information when sampling and testing for compliance demonstrations:

a. The location as specified in this permit, and the date and time that samples and measurements are taken;

b. All pertinent operating conditions existing at the time that samples and measurements are taken;

c. The date that each analysis of a sample or emissions test is performed and the name of the person taking the sample or performing the emissions test;

d. The identity of the Permittee, individual, or other entity that performed the analysis;

e. The analytical techniques and methods used; and

f. The results of each analysis.

12. GENERAL RECORDKEEPING

[COMAR 26.11.03.06C(6)]

The Permittee shall retain records of all monitoring data and information that support the compliance certification for a period of five (5) years from the date that the monitoring, sample measurement, application, report or emissions test was completed or submitted to the Department.

These records and support information shall include:

a. All calibration and maintenance records;

b. All original data collected from continuous monitoring instrumentation;

c. Records which support the annual emissions certification; and

d. Copies of all reports required by this permit.

13. GENERAL CONFORMITY

[COMAR 26.11.26.09]

The Permittee shall comply with the general conformity requirements of 40 CFR 93, Subpart B and COMAR 26.11.26.09.

14. ASBESTOS PROVISIONS

[40 CFR 61, Subpart M]

The Permittee shall comply with 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

15. OZONE DEPLETING REGULATIONS

[40 CFR 82, Subpart F]

The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for MVACs in subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the prohibitions and required practices pursuant to 40 CFR 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair or disposal of appliances shall comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repairs or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.

d. Persons performing maintenance, service, repairs or disposal of appliances shall certify with the Administrator pursuant to 40 CFR 82.162.

e. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in 40 CFR 82.152, shall comply with record keeping requirements pursuant to 40 CFR 82.166.

f. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.

g. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

16. ACID RAIN PERMIT

Not applicable

SECTION IV PLANT SPECIFIC CONDITIONS

This section provides tables that include the emissions standards, emissions limitations, and work practices applicable to each emissions unit located at this facility. The Permittee shall comply with all applicable emissions standards, emissions limitations and work practices included herein.

The tables also include testing, monitoring, record keeping and reporting requirements specific to each emissions unit. In addition to the requirements included here in **Section IV**, the Permittee is also subject to the general testing, monitoring, record keeping and reporting requirements included in **Section III – Plant Wide Conditions** of this permit.

Unless otherwise provided in the specific requirements for an emissions unit, the Permittee shall maintain at the facility for at least five (5) years, and shall make available to the Department upon request, all records that the Permittee is required under this section to establish. [Authority: COMAR 26.11.03.06C(5)(g)]

Table IV – 1

1.0	**Emissions Unit Number(s)** ARMA Registration No. 003-0309-9-0029 EU-208M: One (1) 3,200,689-gallon, gasoline storage tank equipped with an internal floating roof with a vapor mounted primary seal and a secondary wiper seal. EU-212Q: One (1) 3,342,053-gallon, gasoline storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a liquid mounted primary seal and a secondary wiper seal. EU-214S: One (1) 3,248,243-gallon, gasoline storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a liquid mounted primary seal and a secondary wiper seal. EU-215T: One (1) 2,989,433-gallon, gasoline storage tank equipped with an internal floating roof with a liquid mounted primary seal and a secondary wiper seal.

Table IV – 1	
1.1	**Applicable Standards/Limits:** Control of VOC and HAP A. COMAR 26.11.13.03A(1)(a) and (b), which require the Permittee to meet the following equipment requirements for large, closed top storage tanks: 1. Each tank's gauging and sampling devices shall be gas tight except when in use. **[Authority: COMAR 26.11.13.03A(1)(a)]** 2. Each of the storage tanks shall be operated with a well maintained internal floating roof equipped with a primary and secondary seal. **[Authority: COMAR 26.11.13.03A(1)(b)]** B. COMAR 26.11.13.03A(2), which requires the Permittee to meet the following seal requirements: 1. There shall be no visible holes, tears, or other openings in the seal or seal fabric. **[Authority: COMAR 26.11.13.03A(2)(a)]** 2. Each seal shall be intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall. **[Authority: COMAR 26.11.13.03A(2)(b)]** 3. The accumulated area of the gaps between the secondary seal and the tank wall and between the seal and other obstructions inside the tank (that is, ladder, roof supports) that are greater than 1/8 inch in width may not exceed 1.0 square inch per foot of tank diameter. **[Authority: COMAR 26.11.13.03A(2)(c)]** C. 40 CFR §60.112b(a)(1), which requires the Permittee to equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the specifications listed in 40 CFR §60.112b(a)(1)(i), §60.112b(a)(1)(ii)(A), §60.112b(a)(1)(ii)(C), and §60.112b(a)(1)(iii). **[Authority: 40 CFR §60.112b(a)(1), 40 CFR §63.11087(a) and Table 1 to 40 CFR, Part 63, Subpart BBBBBB, requirement 2(b)]**

Table IV – 1	
	The internal floating roof shall be floating on the liquid surface (but not necessarily in complete contact with it) inside the gasoline storage tanks at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. **[Authority: 40 CFR §60.112b(a)(1)(i), 40 CFR §63.11087(a), and Table 1 to 40 CFR, Part 63, Subpart BBBBBB, requirement 2(b)]** **[Note: These requirements also satisfy the requirements of COMAR 26.11.13.03A(1)(b) and COMAR 26.11.13.03A(2).]**
1.2	**Testing Requirements:** Control of VOC and HAP A. See Monitoring, Record Keeping, and Reporting Requirements. B. During all internal tank inspections, the Permittee shall determine the total seal gap by summing the areas of the individual gaps. The lengths and widths of the gaps shall be measured by passing a 1/8 inch diameter probe between the seal and the tank wall and other obstructions in the tank. (The probe should move freely without forcing or binding against the seal). **[Authority: COMAR 26.11.13.03A(4)]** C. See Monitoring, Record Keeping, and Reporting Requirements.
1.3	**Monitoring Requirements:** Control of VOC and HAP A. The Permittee shall perform an annual visual inspection of each tank's gauging and sampling devices. If a failure of a gauging or sampling device is detected during a required visual inspection, the Permittee shall repair the device or empty and remove the tank from service within 45 days. If a repair cannot be made within 45 days and if the tank cannot be emptied within 45 days, a 30-day extension may be requested from the Department. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that will assure that the device will be repaired or the tank will be emptied as soon as possible. **[Authority: COMAR 26.11.03.06C]**

Table IV – 1	
	B. and C. The Permittee shall meet the following monitoring requirements: 1. The Permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal, prior to filling or refilling the storage vessel with volatile organic liquid. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling or refilling the storage vessel. **[Authority: 40 CFR §63.11087(c), 40 CFR §63.11092(e)(1), and 40 CFR §60.113b(a)(1)]** 2. The Permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal through manholes and roof hatches on the fixed roof at least once every twelve (12) months after initial fill. If the internal floating roof is not resting on the surface of the volatile organic liquid inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Department in the inspection report required in 40 CFR §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. **[Authority: 40 CFR §63.11087(c), 40 CFR §63.11092(e)(1), 40 CFR §60.113b(a)(2), §60.113b(a)(3)(ii), COMAR 26.11.13.03A(3)(a), and COMAR 26.11.13.03A(3)(b)]** Note: The annual inspection requirements of 40 CFR, Part 60, Subpart Kb §60.113b(a)(2) and (a)(3)(ii) satisfies the annual inspection requirements of COMAR 26.11.13.03A(3)(a) and (b). 3. The Permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof

Table IV – 1	
	has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with volatile organic liquid. The storage vessel shall be emptied, degassed, and inspected in accordance with the specifications of this paragraph at a frequency of no less than once every ten (10) years. **[Authority: 40 CFR §63.11087(c), 40 CFR §63.11092(e)(1), 40 CFR §60.113b(a)(3)(i), 40 CFR §60.113b(a)(4), and COMAR 26.11.13.03A(3)(c)]**.
1.4	**Record Keeping Requirements:** Control of VOC and HAP A. The Permittee shall record the results of all visual inspections of each tank's gauging and sampling devices. The Permittee shall also record all repairs or replacements including the date and the action taken. **[Authority: COMAR 26.11.03.06C]** B. and C. The Permittee shall maintain the following records: **[Authority: COMAR 26.11.13.03C(4)]** 1. Keep a record of each inspection performed as required by 40 CFR §60.113b(a)(1), (a)(2), (a)(3), and (a)(4) and COMAR 26.11.13.03A(3) for each storage tank. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). This information shall also be included in the semiannual compliance report required by 40 CFR §63.11095(a). **[Authority: COMAR 26.11.13.03C(1), 40 CFR §60.115b(a)(2), 40 CFR §63.11087(e), 40 CFR §63.11094(a), and 40 CFR §63.11095(a)(1)]** 2. All repairs or replacement of the seals, including the date and the action taken for each storage tank. **[Authority: COMAR 26.11.13.03C(2)]**

Table IV – 1	
	3. The average monthly storage temperature and throughput for each storage tank **[Authority: COMAR 26.11.13.03C(3)]**.
1.5	**<u>Reporting Requirements</u>:** <u>Control of VOC and HAP</u> A. Records of visual inspections of each tank's gauging and sampling devices shall be made available to the Department upon request. **[Authority: COMAR 26.11.03.06C]** B. and C. The Permittee shall meet the following reporting requirements: 1. The Permittee shall notify the Department in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 40 CFR §60.113b(a)(1) and (a)(4) to afford the Department the opportunity to have an observer present. If the inspection required by 40 CFR §60.113b(a)(4) is not planned and the Permittee could not have known about the inspection 30 days in advance of refilling the tank, the Permittee shall notify the Department at least seven (7) days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Department at least seven (7) days prior to the refilling. **[Authority: 40 CFR §63.11087(c), 40 CFR §63.11092(e)(1), 40 CFR §60.113b(a)(5), and COMAR 26.11.13.03A(3)(d)]** 2. If any of the conditions described in 40 CFR §60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR §60.113b(a)(2), a report shall be furnished to the Department within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied, or the nature of and date the repair was made. This information shall also be included in the semiannual compliance report required by 40 CFR §63.11095(a). **[Authority: 40 CFR §60.115b(a)(3), 40 CFR §63.11087(e), 40 CFR §63.11094(a), and 40 CFR §63.11095(a)(1)]**

Table IV – 1	
	3. After each inspection required by 40 CFR §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR §60.113b(a)(3)(ii), a report shall be furnished to the Department within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR §60.112b(a)(1) or §60.113b(a)(3) and list each repair made. This information shall also be included in the semiannual compliance report required by 40 CFR §63.11095(a). **[Authority: 40 CFR §60.115b(a)(4), 40 CFR §63.11087(e), 40 CFR §63.11094(a), and 40 CFR §63.11095(a)(1)]** 4. The Permittee shall submit to the Department semiannual compliance reports that include the following information: (a) Records of each inspection performed for each of the storage tanks as required by 40 CFR §60.113b(a)(1), (a)(2), (a)(3), (a)(4), and COMAR 26.11.13.03A(3). **[Authority: 40 CFR §60.115b(a)(2), 40 CFR §63.11087(e), and 40 CFR §63.11095(a)(1)]** (b) Reports of any of the storage tanks having the defects described in 40 CFR §60.113b(a)(2) that are detected during the annual visual inspection required by 40 CFR §60.113b(a)(2). **[Authority: 40 CFR §60.115b(a)(3), 40 CFR §63.11087(e), and 40 CFR §63.11095(a)(1)]** (c) Reports that find any of the storage tanks not meeting the specifications of 40 CFR §60.112b(a)(1) or §60.113b(a)(3) during inspections required by 40 CFR §60.113b(a)(3). **[Authority: 40 CFR §60.115b(a)(4), 40 CFR §63.11087(e), and 40 CFR §63.11095(a)(1)]**

A permit shield shall cover the applicable requirements of the Clean Air Act that are listed in the table above for Emissions Units Numbers: EU-208M, 212Q, 214S, and 215T.

Table IV – 2	
2.0	**Emissions Unit Number(s)** ARMA Registration No. 003-0309-9-0029 EU-213R: One (1) 3,335,066-gallon, gasoline storage tank equipped with a steel pan internal floating roof with a liquid mounted primary seal and a secondary wiper seal. EU-217V: One (1) 2,974,134-gallon, gasoline storage swing tank equipped with an internal floating roof with a liquid mounted primary seal and a secondary wiper seal. EU-218W: One (1) 3,111,005-gallon, ethanol storage tank equipped with an internal floating roof (originally an external floating roof now covered with a geodesic dome which, as a system, acts as an internal floating roof) with a liquid mounted primary seal and a secondary wiper seal.
2.1	**Applicable Standards/Limits:** Control of VOC and HAP A. COMAR 26.11.13.03A(1)(a) and (b), which require the Permittee to meet the following equipment requirements for large, closed top storage tanks: 1. Each tank's gauging and sampling devices shall be gas tight except when in use. **[Authority: COMAR 26.11.13.03A(1)(a)]** 2. Each of the storage tanks shall be operated with a well maintained internal floating roof equipped with a primary and secondary seal. **[Authority: COMAR 26.11.13.03A(1)(b)]** B. COMAR 26.11.13.03A(2), which requires the Permittee to meet the following seal requirements: 1. There shall be no visible holes, tears, or other openings in the seal or seal fabric. **[Authority: COMAR 26.11.13.03A(2)(a)]** 2. Each seal shall be intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall. **[Authority: COMAR 26.11.13.03A(2)(b)]**

Table IV – 2

3. The accumulated area of the gaps between the secondary seal and the tank wall and between the seal and other obstructions inside the tank (that is, ladder, roof supports) that are greater than 1/8 inch in width may not exceed 1.0 square inch per foot of tank diameter. **[Authority: COMAR 26.11.13.03A(2)(c)]**

C. 40 CFR §60.112b(a)(1), which requires the Permittee to equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the specifications listed in 40 CFR §60.112b(a)(1)(i) through (ix), including the following requirements: **[Authority: 40 CFR §60.112b(a)(1)]**

1. The internal floating roof shall be floating on the liquid surface (but not necessarily in complete contact with it) inside the gasoline storage tanks at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. **[Authority: 40 CFR §60.112b(a)(1)(i)]**

2. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: **[Authority: 40 CFR §60.112b(a)(1)(ii)]**

(a) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

(b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

(c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by

Table IV – 2	
	braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof. 3. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. **[Authority: 40 CFR §60.112b(a)(1)(iii)]** 4. The cover or lid for each opening in the internal floating roof shall be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. **[Authority: 40 CFR §60.112b(a)(1)(iv)]** 5. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. **[Authority: 40 CFR §60.112b(a)(1)(v)]** 6. Rim space vents shall be equipped with a gasket and shall be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. **[Authority: 40 CFR §60.112b(a)(1)(vi)]** 7. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. **[Authority: 40 CFR §60.112b(a)(1)(vii)]** 8. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. **[Authority: 40 CFR §60.112b(a)(1)(viii)]** 9. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. **[Authority: 40 CFR §60.112b(a)(1)(ix)]** **[Note: These requirements also satisfy the requirements of COMAR 26.11.13.03A(1)(b) and COMAR 26.11.13.03A(2). In**

Table IV – 2	
	accordance with 40 CFR §63.11087(f), demonstrating compliance with the control requirements of 40 CFR, Part 60, Subpart Kb demonstrates compliance with the storage tank requirements of 40 CFR, Part 63, Subpart BBBBBB.] Operational Requirement D. The Permittee shall not store gasoline in Tank EU-218W unless the Permittee applies for and obtains a permit to construct from the Department. **[Authority: ARMA Permit to Construct No. 003-9-0029 issued February 3, 2006]**
2.2	**Testing Requirements:** Control of VOC and HAP A. See Monitoring, Record Keeping, and Reporting Requirements. B. For each of the three (3) storage tanks, the Permittee shall determine the total seal gap of each storage tank during all internal inspections by summing the areas of the individual gaps. The lengths and widths of the gaps shall be measured by passing a 1/8 inch diameter probe between the seal and the tank wall and other obstructions in the tank. (The probe should move freely without forcing or binding against the seal). **[Authority: COMAR 26.11.13.03A(4)]** C. See Monitoring, Record Keeping, and Reporting Requirements. Operational Requirement D. See Record Keeping and Reporting Requirements.
2.3	**Monitoring Requirements:** Control of VOC and HAP A. The Permittee shall perform an annual visual inspection of each tank's gauging and sampling devices for each of the three (3) storage tanks. If a failure of a gauging or sampling device is detected during a required visual inspection, the Permittee shall repair the device or empty and remove the tank from service within 45 days. If a repair cannot be made within 45 days and if the tank cannot be emptied within 45 days, a 30-day extension may be requested from the Department. Such a request

Table IV – 2

for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that will assure that the device will be repaired or the tank will be emptied as soon as possible. **[Authority: COMAR 26.11.03.06C]**

B and C. The Permittee shall meet the following monitoring requirements:

1. The Permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal, prior to filling or refilling the storage vessel with volatile organic liquid. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling or refilling the storage vessel. **[Authority: 40 CFR §60.113b(a)(1)]**

2. The Permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal through manholes and roof hatches on the fixed roof at least once every twelve (12) months after initial fill. If the internal floating roof is not resting on the surface of the volatile organic liquid inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Department in the inspection report required in 40 CFR §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. **[Authority: 40 CFR §60.113b(a)(2), §60.113b(a)(3)(ii), COMAR 26.11.13.03A(3)(a), and COMAR 26.11.13.03A(3)(b)]** Note: The annual inspection requirements of 40 CFR, Part 60, Subpart Kb §60.113b(a)(2) and (a)(3)(ii) satisfies the annual inspection requirements of COMAR 26.11.13.03A(3)(a) and (b).

Table IV – 2	
	3. The Permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with volatile organic liquid. The storage vessel shall be emptied, degassed, and inspected in accordance with the specifications of this paragraph at a frequency of no less than once every ten (10) years. **[Authority: 40 CFR §60.113b(a)(3)(i), §60.113b(a)(4), and COMAR 26.11.13.03A(3)(c)]**. Operational Requirement D. See Record Keeping and Reporting Requirements.
2.4	**Record Keeping Requirements:** Control of VOC and HAP A. The Permittee shall record the results of all visual inspections of each tank's gauging and sampling devices. The Permittee shall also record all repairs or replacements including the date and the action taken. **[Authority: COMAR 26.11.03.06C]** Control of VOC and HAP / Operational Requirement B., C., and D. The Permittee shall: 1. Keep a record of each inspection performed as required by 40 CFR §60.113b(a)(1), (a)(2), (a)(3), and (a)(4) and COMAR 26.11.13.03A(3) for each storage tank. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). **[Authority: COMAR 26.11.13.03C(1) and 40 CFR**

Table IV – 2	
	§60.115b(a)(2)] 2. Record all repairs or replacement of the seals, including the date and the action taken for each storage tank. **[Authority: COMAR 26.11.13.03C(2)]** 3. Record the average monthly storage temperature and throughput for each storage tank. **[Authority: COMAR 26.11.13.03C(3)]** 4. Maintain readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel. The records shall be maintained on-site for the life of the storage vessels. **[Authority: 40 CFR §60.116b(a) and (b)]** 5. Maintain records of the volatile organic liquid stored, the period of storage, and the maximum true vapor pressure of the volatile organic liquid during the respective storage period for each storage tank. **[Authority: 40 CFR §60.116b(c)]** The maximum true vapor pressure shall be determined using the procedures listed in 40 CFR §60.116b(e). **[Authority: 40 CFR §60.116b(e)]**
2.5	**<u>Reporting Requirements</u>:** <u>Control of VOC and HAP</u> A. Records of visual inspections of each tank's gauging and sampling devices shall be made available to the Department upon request. **[Authority: COMAR 26.11.03.06]** B. and C. The Permittee shall meet the following reporting requirements: 1. The Permittee shall notify the Department in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 40 CFR §60.113b(a)(1) and (a)(4) to afford the Department the opportunity to have an observer present. If the inspection required by 40 CFR §60.113b(a)(4) is not planned and the Permittee could not have known about the inspection 30 days in advance of refilling the tank, the Permittee shall notify the Department at least seven (7) days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed

Table IV – 2	
	by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Department at least seven (7) days prior to the refilling. **[Authority: 40 CFR §60.113b(a)(5) and COMAR 26.11.13.03A(3)(d)]** 2. If any of the conditions described in 40 CFR §60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR §60.113b(a)(2), a report shall be furnished to the Department within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied, or the nature of and date the repair was made. **[Authority: 40 CFR §60.115b(a)(3)]** 3. After each inspection required by 40 CFR §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR §60.113b(a)(3)(ii), a report shall be furnished to the Department within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR §60.112b(a)(1) or §60.113b(a)(3) and list each repair made. **[Authority: 40 CFR §60.115b(a)(4)]** <u>Operational Requirement</u> D. The Permittee shall notify and obtain approval from the Department prior to storing gasoline in storage tank EU-218W. **[Authority: ARMA Permit to Construct No. 003-9-0029 issued February 3, 2006 and COMAR 26.11.02.09A]**

A permit shield shall cover the applicable requirements of the Clean Air Act that are listed in the table above for Emissions Units Numbers: EU-213R, 217V, and 218W.

Table IV – 3	
3.0	**Emissions Unit Number(s)** ARMA Registration Number: 003-0309-9-0029 EU-10: One (1) 8,000-gallon, fuel additive, horizontal storage tank. EU-11: One (1) 8,000-gallon, fuel additive, horizontal storage tank. EU-15: One (1) 10,000-gallon, fuel additive, horizontal storage tank. EU-16: One (1) 10,000-gallon, fuel additive, horizontal storage tank. EU-17: One (1) 8,000-gallon, fuel additive, horizontal storage tank. EU-23: One (1) 4,500-gallon, slop refined ethanol, horizontal storage tank. EU-26: One (1) 4,300-gallon, fuel additive, horizontal storage tank.
3.1	**Applicable Standards/Limits:** Control of VOC A. COMAR 26.11.06.06B(1)(a), which requires that the Permittee limit emissions of VOC to not more than 200 pounds per day from installations constructed before May 12, 1972 unless VOC emissions are reduced by 85 percent or more overall. This requirement applies to EU-15, EU-16, and EU-17. COMAR 26.11.06.06B(1)(b), which requires that the Permittee limit emissions of VOC to not more than 20 pounds per day from installations constructed after May 12, 1972 unless VOC emissions are reduced by 85 percent or more overall. This requirement applies to EU-10, EU-11, EU-23, and EU-26. Operational Requirement B. The Permittee shall store only additive or other volatile organic liquids that do not subject any of the storage tanks to the requirements of COMAR 26.11.13 and/or 40 CFR 60, Subpart Kb unless the Permittee obtains an approval from the Department. **[Authority: COMAR 26.11.02.09A]**

Table IV – 3	
3.2	**Testing Requirements:** Control of VOC / Operational Requirement A. and B. See Record Keeping and Reporting Requirements.
3.3	**Monitoring Requirements:** Control of VOC / Operational Requirement A. and B. See Record Keeping and Reporting Requirements.
3.4	**Record Keeping Requirements:** Control of VOC / Operational Requirement A. and B. The Permittee shall maintain the following annual records of the amounts, types, and composition of all materials loaded into each tank **[Authority: ARMA Permit to Construct No. 02-9-0599 issued on February 2, 1998]**
3.5	**Reporting Requirements:** Control of VOC / Operational Requirement A. and B. The Permittee shall make the records of the description of the materials loaded into each tank available to the Department upon request. **[Authority: ARMA Permit to Construct No. 02-9-0599 issued on February 2, 1998]**

A permit shield shall cover the applicable requirements of the Clean Air Act that are listed in the table above for Emission Unit Numbers 10, 11, 15, 16, 17, 23, and 26.

Table IV – 4	
4.0	**Emissions Unit Number(s)** ARMA Registration No. 003-0309-9-0029 EU-LR: A five lane loading rack controlled primarily by a John Zink vapor recovery unit (VRU). A John Zink vapor combustion unit (VCU) is used for back-up control.
4.1	**Applicable Standards/Limits:** A. Visible Emissions Limitations **COMAR 26.11.06.02C(2)**, which prohibits visible emissions other than water in an uncombined form. This limitation applies to the John Zink VCU only. Exceptions. **COMAR 26.11.06.02A(2)** establishes that the visible emissions limitation does not apply to emissions during start-up, and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period. B. Control of VOC and HAP (Vapor Collection and Control Requirements) 1. The vapor collection and control system controlling emissions from the loading system shall collect the total organic compound (TOC) vapors displaced from cargo tanks during product loading and shall control at least 90 percent of all vapors from the loading racks. **[Authority: 40 CFR §60.502(a), COMAR 26.11.13.04A(1)(a), 40 CFR §63.11088(a), and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(a)]** 2. The emissions from the vapor collection and control system shall be limited to 0.083 pounds of TOC per 1,000 gallons (10 milligrams of TOC per liter) of gasoline or VOC loaded. Note: Compliance with this requirement also demonstrates compliance with the requirements of COMAR 26.11.13.04A(1)(a)(i), 40 CFR §60.502(b), 40 CFR §63.11088(a), and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(b). **[Authority: COMAR 26.11.03.06C, COMAR 26.11.13.04A(1)(a)(i), 40 CFR §60.502(b), Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(b)]**

Table IV – 4

This emissions limitation is equivalent to the following: VOC emissions from the VRU or the VCU when controlling emissions from the loading rack shall be less than 9 pounds per hour (based on the emission factor of 10 milligrams of TOC per liter when loading 108,000 gallons of gasoline per hour), unless the Permittee demonstrates to the satisfaction of the Department that the modification to the loading rack to allow butane blending is not considered a modification in accordance with the New Source Performance Standards of 40 CFR, Part 60, Subparts A and XX at a higher emission rate. **[Authority: ARMA Permit to Construct No. 003-0309-9-0039 issued October 3, 2011]**

C. Control of VOC and HAP (Vapor Tight Tank Truck Requirements)

The Permittee shall limit the loading of gasoline into gasoline cargo tanks that are vapor tight using the procedures specified in 40 CFR, Part 60, Subpart XX, §60.502(e) through (j). For the purposes of this requirement, the term "tank truck" as used in 40 CFR §60.502(e) through (j) means "cargo tank" as defined in 40 CFR §63.11100. **[Authority: 40 CFR §63.11088(a) and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(d)]**

The Permittee may not allow a gasoline or VOC tank truck to be filled or emptied unless the tank has been certified annually as capable of sustaining a pressure change of not more than three (3) inches of water in five (5) minutes when pressurized to a gauge pressure of 18 inches of water (4,479 kilonewtons/square meter), or evacuated to a gauge pressure of six (6) inches of water (1,493 kilonewtons/square meter), during a test, according to the procedure referenced in COMAR 26.11.13.05B(2). The Permittee shall complete any needed repairs, and retest within 15 days of the original test date. **[Authority: 40 CFR §60.502(e) and COMAR 26.11.13.05A and B]**

D. Control of VOC and HAP (Back Pressure and Leak Requirements)

The vapor collection and control system and the liquid loading equipment shall be operated to control back pressure and leaks such that:

1. The gauge pressure in the delivery tank shall not exceed 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures

Table IV – 4

specified in 40 CFR §60.503(d). **[Authority: 40 CFR §60.502(h) and §60.503(d)]**

2. No pressure-vacuum vent in the bulk gasoline terminal's vapor collection and control system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). **[Authority: 40 CFR §60.502(i)]**

3. During loading, the gasoline or VOC tank truck pressure does not exceed 18 inches of water, and vacuum does not exceed 6 inches of water. **[Authority: COMAR 26.11.13.04A(1)(b)(i)]**

4. There are no gasoline or VOC leaks in the system when tested by the method referenced in COMAR 26.11.13.04A(3)(a) during loading or unloading operations. **[Authority: COMAR 26.11.13.04A(1)(b)(ii)]**

E. Control of VOC and HAP (Design and Operational Requirements)

1. The exhaust gases from the loading rack shall vent through the VRU or the VCU prior to discharging to the atmosphere. **[Authority: COMAR 26.11.03.06C]**

2. The vapor collection system shall prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack or lane to the atmosphere. **[Authority: 40 CFR §60.502(d), 40 CFR §63.11088(a), and Table 2 to 40 CFR, Part 63, Subpart BBBBBB, requirement 1(c)]**

3. The Permittee shall assure that loadings of gasoline or VOC tank trucks are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. **[Authority: 40 CFR §60.502(f)]**

4. The Permittee shall assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline or VOC tank truck. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. **[Authority: 40 CFR §60.502(g)]**

Table IV – 4	
	5. The Permittee shall maintain a top submerged or bottom loading system on the terminal's loading racks. **[Authority: COMAR 26.11.13.04A(1)(c)]** F. Control of VOC and HAP (Operational Requirement) The Permittee shall only load ethanol from the fifth lane of the loading rack unless prior approval is obtained from the Department to load other materials. **[Authority: ARMA Permit to Construct No. 003-0309-9-0029 issued on October 3, 2011]**
4.2	**Testing Requirements:** A. Visible Emissions Requirements See Monitoring, Record Keeping, and Reporting Requirements. B. Control of VOC and HAP (Vapor Collection and Control Requirements) 1. The Permittee shall conduct performance tests on the facility's VCU and VRU to determine total organic emissions per liter of gasoline loaded at the facility and to determine an overall control efficiency for VOC emissions caused by the facility's loading operations at least once every five (5) years, during the period between May and September 15. **[Authority: COMAR 26.11.13.04A(2)(a)(i)]** 2. The tests shall be conducted in accordance with the test methods and procedures listed in 40 CFR §63.11092(a)(1)(i) and (ii), 40 CFR §60.503(a), §60.503(b), and §60.503(c) and Method 1009 of the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources" (January 1991). **[Authority: 40 CFR §60.503(a) through (c), COMAR 26.11.13.04A(3)(b), 40 CFR §63.11092(a)(1)(i) and (ii), and 40 CFR §63.11092(a)(2)]** 3. The Permittee shall notify the Department not less than 60 days before the scheduled test date, and the notification shall contain a copy of the test protocol required under COMAR 26.11.13.04A(2)(a)(ii) and 40 CFR §63.7(c). A copy of the test results shall be submitted to the Department no later than 60 days

Table IV – 4

after the test date. **[40 CFR §63.9(e), §63.11093(c), COMAR 26.11.13.04A(2)(a)(ii) and (iii)]**

4. Unless the Permittee obtains from the Department written approval to monitor and record an alternative operating parameter, during each required performance test on the VRU, the Permittee shall continuously monitor and record the organic compound concentration in the exhaust air stream using a continuous emissions monitoring system (CEMs). **[Authority: 40 CFR §63.11092(b)(1), §63.11092(b)(1)(i)(A), §63.11092(b)(1)(iv), §63.11092(b)(3), (4), and (5)]**

5. For all subsequent performance tests performed after the initial performance test required under 40 CFR §63.11092(a), the Permittee shall document the reasons for any change in the operating parameter values since the previous performance test. **[Authority: 40 CFR §63.11092(c)]**

6. Performance tests conducted shall be conducted under conditions that the Department specifies based on representative performance (i.e., performance based on normal operating conditions) of the VRU or the VCU. The Permittee shall make available to the Department upon request necessary records to determine the conditions of the performance tests. **[Authority: 40 CFR §63.11092(g)]**

C. <u>Control of VOC and HAP (Vapor Tight Tank Truck Requirements)</u>

The annual certification test for gasoline cargo tanks shall consist of the following test methods: EPA Method 27, Appendix A-8, 40 CFR Part 60 and Method1007 of the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources," (January 1991) which is incorporated by reference in COMAR 26.11.01.04C.

The test shall be conducted using a time period (t) for the pressure and vacuum tests of five (5) minutes. The initial pressure (Pi) for the pressure test shall be 18 inches of water gauge. The initial vacuum (Vi) for the vacuum test shall be six (6) inches of water, gauge. The maximum allowable pressure and vacuum changes (Δ p, Δ v) for all affected gasoline cargo tanks is three (3) inches of water, or less, in five (5) minutes.

Table IV – 4	
	Any needed repairs shall be completed and the cargo tank shall be retested within 15 days of the original test date. **[Authority: COMAR 26.11.13.05B, 40 CFR §63.11088(d) and §63.11092(f)]** D. Control of VOC and HAP (Back Pressure and Leak Requirements) 1. The Permittee shall test for leak-tight conditions in the vapor control system and the gasoline loading equipment during loading or unloading operations, as required in COMAR 26.11.13.04A(1)(b)(ii) each calendar month. The Permittee shall conduct the tests as prescribed in Method 1008 of the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources" (January 1991). **[Authority: COMAR 26.11.13.04A(1)(b)(ii), COMAR 26.11.13.04A(3)(a), and 40 CFR §63.11089(a)]** 2. A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with +/-2.5 mm of water precision, shall be calibrated and installed on the facility's vapor collection system at a pressure tap location as close as possible to the connection with the gasoline cargo tank. **[Authority: 40 CFR §60.503(d)(1) and §60.503(h)]** E. Control of VOC and HAP (Design and Operational Requirements) The vapor collection and control system is designed to operate as required. **[Authority: COMAR 26.11.02.09A]** F. Control of VOC and HAP (Operational Requirements) See Record Keeping and Reporting Requirements.
4.3	**Monitoring Requirements:** A. Visible Emissions Requirements At least once per month, the Permittee shall observe the stack of the VCU as specified in the CAM Plan for visible emissions when the VCU is operating. An operator familiar with the maintenance and operation of the VCU shall conduct each observation for a six (6) minute period. If the unit does not operate during a month, a record shall be maintained to

Table IV – 4

indicate that no observation was required during that month.

The Permittee shall perform the following, if emissions are visible:

1. Inspect combustion control and damper system.

2. Perform all necessary adjustments and/or repairs to the combustor within 48 hours, so that visible emissions are eliminated.

3. Document in writing the results of the inspections, adjustments and/or repairs to the combustor.

4. After 48 hours, if the required adjustments and/or repairs have not eliminated the visible emissions, take additional remedial actions and continue to perform a Method 9 observation once daily for 18 minutes until corrective action has achieved compliance. **[Authority: COMAR 26.11.03.06C and See Indicator 4 of the CAM Plan in Table IV-5]**

B. Control of VOC and HAP (Vapor Collection and Control Requirements)

1. The Permittee shall calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) while gasoline vapors are displaced to the vapor processing system consisting of the VRU and the VCU. **[Authority: 40 CFR §63.11092(b)]**

2. When the VRU is used to control emissions from the loading rack, the Permittee shall comply with the following monitoring requirements unless the Department approves alternative monitoring requirements under 40 CFR §63.8(b), §63.8(f), and 40 CFR, Part 63, Subpart BBBBBB: **[Authority: 40 CFR §63.8(b), §63.8(f), §63.11092(b)(1)(iv), and §63.11092(b)(3), (4), and (5)]**

   (a) The Permittee shall perform semi-annual preventative maintenance of the VRU according to the recommendations of the manufacturer of the system or other procedures approved by the Department. **[Authority: COMAR 26.11.03.06C]**

Table IV – 4	
	(b) The Permittee shall maintain a continuous emissions monitoring system (CEMS) capable of measuring the organic compound concentration in the exhaust air stream of the VRU. The CEMS shall meet applicable performance specifications in 40 CFR 60, Appendix B. **[Authority: 40 CFR §63.11092(b)(1), §63.11092(b)(1)(i)(A), and Table 3 to 40 CFR, Part 63, Subpart BBBBBB]** (c) The Permittee shall maintain and operate the CEMS in a manner consistent with good air pollution control practices as follows: The Permittee must keep the necessary parts for routine repairs of the affected CEMS equipment readily available. **[Authority: 40 CFR §63.8(c)(1)]** (d) Except for system breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level calibration drift adjustments, the CEMS shall be in continuous operation and shall meet minimum frequency of operation requirements as follows: the CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. **[Authority: 40 CFR §63.8(c)(4)]** (e) The Permittee must check the zero (low-level) and high-level calibration drifts at least once daily in accordance with the written procedure specified in the performance evaluation plan developed under 40 CFR §63.8(e)(3)(i) and (ii). The zero (low-level) and high-level calibration drifts must be adjusted, at a minimum, whenever the 24-hour zero (low-level) drift exceeds two times the limits of the applicable performance specifications. The system shall allow the amount of excess zero (low-level) and high-level drift measured at the 24-hour interval checks to be recorded and quantified whenever specified. **[Authority: 40 CFR §63.8(c)(6)]** (f) The CEMS is out of control if the zero (low-level), mid-level (if applicable), or high-level calibration drift (CD) exceeds two times the applicable CD specification in the applicable performance specification; or the CEMS fails a performance test audit (e.g., cylinder gas audit), relative

Table IV – 4

accuracy audit, relative accuracy test audit, or linearity test audit. **[Authority: 40 CFR §63.8(c)(7)(i)]**

(g) When the CEMS is out of control, the Permittee shall take necessary corrective action and shall repeat all necessary tests which indicate that the system is out of control. The Permittee shall take corrective action and conduct retesting until the performance requirements are below the applicable limits.

The beginning of the out-of-control period is the hour the Permittee conducts a performance check (e.g., calibration drift) that indicates an exceedance of the performance requirements. The end of the out-of-control period is the hour following the completion of corrective action and successful demonstration that the system is within the allowable limits.

During the period the CEMS is out of control, recorded data shall not be used in data averages and calculations, or to meet any data availability requirement.
[Authority: 40 CFR §63.8(c)(7)(ii)]

(h) The Permittee must reduce the CEMS monitoring data as follows:

(i) Data from CEMS shall be reduced to 1-hour averages computed from four or more data points equally spaced over each 1-hour period, except during periods when calibration, quality assurance, or maintenance activities being performed. During these periods, a valid hourly average shall consist of at least two data points with each representing a 15-minute period. Alternatively, an arithmetic or integrated 1-hour average of CEMS data may be used. Time periods for averaging are defined in 40 CFR §63.2.

(ii) The data may be recorded in reduced or nonreduced form.

(iii) All emission data shall be converted into milligrams per liter for reporting purposes.

Table IV – 4

(iv) Monitoring data recorded during periods of unavoidable CEMS breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level adjustments must not be included in any data average computed unless the Permittee complies with the requirements of 40 CFR §63.10(b)(2)(vii)(A) or (B). **[Authority: 40 CFR §63.8(g)]**

3. When the VCU is used to control emissions from the loading rack, the Permittee shall comply with the CAM Plan for the VCU in Table IV-5 of this permit and the following requirements: **[Authority: 40 CFR §63.11092(b)(1) and §63.11092(b)(1)(iii)]**

(a) A continuous parameter monitoring system (CPMS) capable of measuring temperature shall be maintained in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs.

OR

(b) The presence of a thermal oxidation system pilot flame shall be monitored as specified under Indicator No. 3 of the CAM Plan for the VCU using a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, installed in proximity of the pilot light, to indicate the presence of a flame. The heat-sensing device shall send a positive parameter value to indicate that the pilot flame is on, or a negative parameter value to indicate that the pilot flame is off.

(c) Maintain a monitoring and inspection plan that describes the Permittee's approach for meeting the following requirements:

(i) The VCU shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent.

Table IV – 4

(ii) The Permittee shall verify during each day of operation of the loading rack, the proper operation of the assist-air blower and the vapor line valve. Verification shall be through visual observation or through an automated alarm or shutdown system that monitors system operation. A manual or electronic record of the start and end of a shutdown event may be used.

(iii) The Permittee shall perform semi-annual preventative maintenance inspections of the VCU, including the automated alarm or shutdown system according to the recommendations of the manufacturer of the system.

(iv) The monitoring and inspection plan shall specify conditions that would be considered malfunctions of the VCU during the inspections or automated monitoring, describe specific corrective actions that will be taken to correct any malfunction, and define what the Permittee would consider to be a timely repair for each potential malfunction.

[Authority: §63.11092(b)(1)(iii)]

4. The Permittee shall operate the VRU and the VCU in a manner not to exceed or not to go below, as appropriate, the operating parameter values for the parameters established in the last performance test and the CAM Plan included in Table IV-5. **[Authority: 40 CFR §63.11092(d)(1) and (2)]**.

5. Operation of the vapor processing system in a manner exceeding or going below the operating parameter value, as appropriate, shall constitute a violation of the emission standard in 40 CFR §63.11088(a), except for the following: for monitoring and inspection, as required under §63.11092(b)(1)(i)(B)(*2*) and (b)(1)(iii)(B)(*2*), malfunctions that are discovered shall not constitute a violation of the emission standard in 40 CFR §63.11088(a) if corrective actions as described in the monitoring and inspection plan are followed. The Permittee must:

   (a) Initiate corrective action to determine the cause of the problem within one (1) hour.

   (b) Initiate corrective action to fix the problem within 24 hours.

Table IV – 4

(c) Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions.

(d) Minimize periods of start-up, shutdown, or malfunction.

(e) Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem. **[Authority: 40 CFR §63.11092(d)(3) and (4)]**

6. The Permittee shall, at all times, operate and maintain any affected source subject to the requirements of 40 CFR, Part 63, Subpart BBBBBB, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The Department will determine whether such operation and maintenance procedures are being used based on information available to the Department which may include monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **[Authority: 40 CFR §63.11085(a)]**

C. <u>Control of VOC and HAP (Vapor Tight Tank Truck Requirements)</u>

The Permittee shall ensure that loadings of gasoline or VOC into tank trucks are limited to vapor-tight tank trucks using the following procedures: **[Authority: COMAR 26.11.13.05D(2), 40 CFR §60.502(e), §63.11088(a), and Table 2, Item 1(d) of 40 CFR, Part 63, Subpart BBBBBB]**

1. The Permittee shall obtain the vapor tightness documentation specified in 40 CFR §60.505(b) and COMAR 26.11.13.05D(2) for each gasoline or VOC tank truck which is to be loaded at the facility. **[Authority: 40 CFR §60.502(e)(1) and COMAR 26.11.13.05D(2)]**

2. The Permittee shall require the tank identification number to be recorded as each gasoline or VOC tank truck is loaded at the facility. **[Authority: 40 CFR §60.502(e)(2) and COMAR 26.11.13.05D(2)]**

3. The Permittee shall cross-check each tank identification number with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded. **[Authority: 40 CFR §60.502(e)(3)]**

Table IV – 4

(a) If less than an average of one gasoline or VOC tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or **[Authority: 40 CFR §60.502(e)(3)(i)(A)]**

(b) If less than an average of one gasoline or VOC tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually. **[Authority: 40 CFR §60.502(e)(3)(i)(B)]**

If either the quarterly or semiannual cross-checks reveals that these conditions were not maintained, the Permittee must return to biweekly monitoring until such time as these conditions are met again. **[Authority: 40 CFR §60.502(e)(3)(ii)]**

4. The Permittee shall take steps to assure that the nonvapor-tight tank truck will not be reloaded at the facility until vapor tightness documentation for that tank is obtained. **[Authority: 40 CFR §60.502(e)(5)]**

5. Alternate procedures to those described for limiting gasoline tank truck loadings (as listed in 40 CFR §60.502(e)(1) through (e)(5)) may be approved by the Department. **[Authority: 40 CFR §60.502(e)(6)]**

D. Control of VOC and HAP (Back Pressure and Leak Requirements)

1. The Permittee shall conduct pressure monitoring and leak inspections each calendar month of all equipment in gasoline service, as defined in 40 CFR §63.11100, including the vapor collection system, the vapor processing system, and each loading rack handling gasoline or VOC. The vapor collection system, the vapor processing system, and each loading rack handling gasoline or VOC shall be inspected during the loading of tank trucks for total organic compounds liquid or vapor leaks. For these inspections, detection methods incorporating sight, sound, and smell are acceptable. The source of the leak shall be repaired within 15 calendar days after it is detected. **[Authority: 40 CFR 40 CFR §60.502(j) and §63.11089(a)]**

Table IV – 4	
	2. The Permittee shall use a log book to record the required monthly leak inspections. The log book shall be signed by the Permittee at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. **[Authority: 40 CFR §63.11089(b)]** 3. The Permittee shall record each detection of a liquid or vapor leak in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than five (5) calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except if there is a delay of repair. Delay of repair of leaking equipment is allowed if the repair is not feasible within 15 days. The Permittee shall provide in the semiannual report specified in 40 CFR §63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed. **[Authority: 40 CFR 40 CFR §63.11089(c) and (d)]** 4. Each calendar month, the Permittee shall check the back pressure in the vapor collection system during loading of tank trucks. The Permittee shall make each determination during a period of maximum product flow and at a point as close to the adapter for a gasoline tank truck's vapor recovery line as possible. **[Authority: See Indicator 1 of the CAM Plan in Table IV-5]** E. <u>Control of VOC and HAP (Design and Operational Requirements)</u> The vapor collection and control system is designed to operate as required. **[Authority: COMAR 26.11.02.09A]** F. <u>Control of VOC and HAP (Operational Requirements)</u> See Record Keeping and Reporting Requirements.
4.4	**<u>Record Keeping Requirements</u>:** A. <u>Visible Emissions Requirements</u> The Permittee shall maintain a log of the visible emissions observations performed as specified in the CAM Plan on the VCU and any corrective actions taken. **[Authority: COMAR 26.11.03.06C and see Indicator 4 of the CAM Plan in Table IV-5]**

Table IV – 4	
	B. Control of VOC and HAP (Vapor Collection and Control Requirements) 1. The Permittee shall maintain the following records for the vapor recovery collection system and the VRU: (a) Records of all mass emission rate performance tests conducted on the VRU. **[Authority: COMAR 26.11.13.04A(2)(a)(iii)]** (b) Records of all maintenance and repairs performed on the VRU. **[Authority: COMAR 26.11.13.04A(2)(b)]** (c) Records of all replacements or additions of components on the VRU. **[Authority: 40 CFR §60.505(f)]** (d) A copy of the performance evaluation results for the CEMS. **[Authority: 40 CFR §63.8(e)(5)]** (e) An up-to-date, readily accessible record of the CEMS data required under 40 CFR §63.11092(b). These records shall indicate the time intervals during which loadings of gasoline cargo tanks have occurred or, alternatively, shall record the CEMS data only during such loadings. The date and time of day shall also be indicated at reasonable intervals on these records. **[Authority: 40 CFR §63.11094(f)(1)]** 2. The Permittee shall maintain the following records for the vapor recovery collection system and the VCU: (a) Records of all mass emission rate performance tests conducted on the VCU. **[Authority: COMAR 26.11.13.04A(2)(a)(iii)]** (b) Records of all maintenance and repairs performed on the VCU. **[Authority: COMAR 26.11.13.04A(2)(b)]** (c) Records of all replacements or additions of components on the VCU. **[Authority: 40 CFR §60.505(f)]** (d) An up-to-date readily accessible copy of the monitoring and inspection plan required under 40 CFR §63.11092(b)(1)(iii)(B)(*2*). **[Authority: 40 CFR**

Table IV – 4

§63.11094(f)(3)]

(e) An up-to-date, readily accessible record of all system malfunctions including records of the occurrence and duration of each malfunction of operation of process equipment or the air pollution control and monitoring equipment. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR §63.11085(a), including corrective actions to restore manufacturing process and air pollution control and monitoring equipment to its normal or usual manner of operation.

As specified in §63.11092(b)(1)(iii)(B)(*2*)(*v*), the Permittee shall document any system malfunction associated with the VCU, as defined in the VCU monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of a record. These records shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction.

[Authority: 40 CFR §63.11094(f)(4), §63.11094(g)(1) and (2), §63.11092(b)(1)(iii)(B)(*2*)(*v*), and Indicator 3 of the CAM Plan, Table IV-5]

(f) Records of all preventative maintenance as required by the CAM Plan for the VCU. **[Authority: See Indicator 3 of the CAM Plan in Table IV-5]**

C. <u>Control of VOC and HAP (Vapor Tight Tank Truck Requirements)</u>

The Permittee shall maintain the following records to ensure each tank truck's vapor tightness, including annual certification testing performed in accordance with 40 CFR §63.11092(f)(1) **[Authority: 40 CFR §63.11094(b) and §63.11094(b)(1)]**:

1. Records of each tank truck's vapor tightness documentation required under §60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection. **[Authority: 40 CFR**

Table IV – 4	
	§60.505(a)] Records of each tank truck's vapor tightness documentation file shall be updated at least once per year to reflect current test results as determined by EPA Reference Method 27. In accordance with 40 CFR §60.505(b) and COMAR 26.11.13.05D(2), this documentation shall include, as a minimum, the following information: (a) Test title: Gasoline Delivery Tank Pressure Test – EPA Reference Method 27 or an approved alternative method. (b) Tank owner and address. (c) Tank identification number. (d) Testing location. (e) Date of test. (f) Date and type of repair, if applicable. (g) Date of retest, if applicable. (h) Tester name and signature. (i) Witnessing inspector, if any: Name, signature, and affiliation. (j) Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing. (k) Test results: Actual pressure change in 5 minutes, millimeters of water (average for two (2) runs). (l) Pressure testing: The initial and final test pressure, the time of each reading, and the actual pressure change. (m) Vacuum testing: The initial and final test vacuum, the time of each reading, and the actual vacuum change. (n) Number of leaks found with an instrument and leak definition. **[Authority: COMAR 26.11.13.05D(1)(a), COMAR 26.11.13.05D(2), 40 CFR §60.505(b), §63.11088(f), §63.11094(b)(2)]** 2. Documentation of all notifications for non-vapor-tight tank trucks as specified in 40 CFR §60.502(e)(4). **[Authority: 40 CFR §60.505(d)]** 3. As an alternative to keeping records at the terminal of each gasoline or VOC cargo tank test results as required in 40 CFR §60.505(a), (c), (d), and §63.11094(b), the Permittee may comply with one of the following requirements: **[Authority: 40 CFR §60.505(e), §63.11088(f), and 40 CFR §63.11094(c)(1) and (2)]** (a) An electronic copy of each record is instantly available at the terminal. **[Authority: 40 CFR §60.505(e)(1) and 40 CFR §63.11094(c)(1)]** (i) The copy of each record in paragraph §60.505(e)(1)

Table IV – 4

and 40 CFR §63.11094(c)(1) is an exact duplicate image of the original paper record with certifying signatures. **[Authority: 40 CFR §60.505(e)(1)(i) and 40 CFR §63.11094(c)(1)(i)]**

(ii) The Department is notified in writing that each terminal using this alternative is in compliance with paragraph §60.505(e)(1) and 40 CFR §63.11094(c)(1). **[Authority: 40 CFR §60.505(e)(1)(ii) and 40 CFR §63.11094(c)(1)(ii)]**

OR

(b) For facilities that utilize a terminal automation system to prevent gasoline or VOC cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by Department representatives during the course of a site visit, or within a mutually agreeable time frame. **[Authority: 40 CFR §60.505(e)(2) and 40 CFR §63.11094(c)(2)]**

(i) The copy of each record in 40 CFR §60.505(e)(2) and 40 CFR §63.11094(c)(2) is an exact duplicate image of the original paper record with certifying signatures. **[Authority: 40 CFR §60.505(e)(2)(i) and 40 CFR §63.11094(c)(2)(i)]**

(ii) The Department is notified in writing that each terminal using this alternative is in compliance with 40 CFR §60.505(e)(2) and 40 CFR §63.11094(c)(2). **[Authority: 40 CFR §60.505(e)(2)(ii) and 40 CFR §63.11094(c)(2)(ii)]**

D. Control of VOC and HAP (Back Pressure and Leak Requirements)

1. To demonstrate compliance with the leak detection requirements under 40 CFR §63.11089, the Permittee shall prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service. If the Permittee elects to implement an instrument program under §63.11089, the record shall include a full description of the program. **[Authority: 40 CFR §63.11094(d)]**

Table IV – 4

2. The Permittee shall maintain monthly leak inspection records consisting of each detection of a total organic compounds liquid or vapor leak from the vapor collection system, the vapor processing system, and each loading rack handling gasoline. The inspection records shall include, as a minimum, the following information: **[Authority: 40 CFR §60.502(j), 40 CFR §60.505(c), and 40 CFR §63.11094(e)]**

   (a) Date of inspection.
   (b) The equipment type and identification number.
   (c) Findings: may indicate no leaks discovered; or location, nature of the leak (i.e., vapor or liquid), and severity of each leak.
   (d) Leak determination method (i.e., sight, sound, or smell).
   (e) The date the leak was detected, the date of each attempt to repair the leak, and reasons for any repair interval in excess of fifteen (15) days.
   (f) Repair methods applied in each attempt to repair the leak.
   (g) The expected date of successful repair of the leak if the leak is not repaired within 15 days.
   (h) The date of successful repair of the leak.
   (i) Inspector name and signature.

3. The Permittee shall maintain monthly records of the back pressure reading in the vapor collection system during the loading of tank trucks during a period of maximum product flow. **[See Indicator 1 of the CAM Plan, Table IV-5]**

E. Control of VOC and HAP (Design and Operational Requirements)

The vapor collection and control system is designed to operate as required. **[Authority: COMAR 26.11.02.09A]**

F. Control of VOC and HAP (Operational Requirements)

1. Records of the types and amounts of materials loaded in the fifth lane of the loading rack. **[Authority: ARMA Permit to Construct No. 003-9-0029 issued on April 11, 2006]**

2. Records of the types and amounts of materials loaded in the four (4) lanes of the loading rack loading gasoline and distillate products. **[Authority: ARMA Permit to Construct No. 003-0309-9-0029 issued on October 3, 2011]**

Table IV – 4	
4.5	**Reporting Requirements:** A. Visible Emissions Requirements The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations" and any corrective actions on the VCU as specified in the CAM Plan. **[Authority: COMAR 26.11.03.06 and See Indicator 4 of the CAM Plan Table IV-5]** B. Control of VOC and HAP (Vapor Collection and Control Requirements) 1. The Permittee shall notify the Department prior to using the VCU as a main control device for purposes other than VRU maintenance, when the duration of such non-maintenance usage is more than seven (7) consecutive days. **[Authority: ARMA Permit to Construct No. 003-0309-9-0039 issued October 3, 2011]** 2. The Permittee shall submit an excess emissions report to the Department. The excess emissions report shall be submitted as a part of the semiannual compliance report. The excess emissions report shall include the following information: **[Authority: 40 CFR §63.8(c)(8), §63.11088(f), and §63.11095(b)]** (a) Each instance of non-vapor-tight gasoline cargo tank loading which failed to assure that such cargo tank would not be reloaded before vapor tightness documentation was obtained. (b) Each reloading of a non-vapor-tight gasoline cargo tank before vapor tightness documentation is obtained in accordance with 40 CFR §63.11094(b). (c) Each exceedance or failure to maintain the monitored operating parameter value determined under 40 CFR §63.11092(b). The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CMS.

Table IV – 4

(d) Each instance in which malfunctions discovered during the monitoring and inspections required under 40 CFR §63.11092(b)(1)(i)(B)(2) and (b)(1)(iii)(B)(2) were not resolved according to the necessary corrective actions described in the monitoring and inspection plan. The report shall include a description of the malfunction and the timing of the steps taken to correct the malfunction.

(e) For each occurrence of an equipment leak for which no repair attempt was made within five (5) days or for which repair was not completed within 15 days after detection:

(i) The date on which the leak was detected.

(ii) The date of each attempt to repair the leak.

(iii) The reasons for the delay of repair.

(iv) The date of successful repair.

3. The Permittee shall submit a semiannual report including the number, duration, and a brief description of each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the Permittee during a malfunction of an affected source to minimize emissions in accordance with 40 CFR §63.11085(a), including actions taken to correct a malfunction. The report shall be submitted as a part of the semiannual compliance report. **[Authority: 40 CFR §63.11088(f) and §63.11095(d)]**

4. The Permittee shall report all deviations from Indicator 3 of the CAM Plan requirements as specified in the CAM Plan for the VCU included in Table IV-5. The Permittee shall submit these deviations with the semiannual monitoring report.

C. <u>Control of VOC and HAP (Vapor Tight Tank Truck Requirements)</u>

The Permittee shall notify the owner or operator of each non-vapor-tight gasoline or VOC tank truck loaded at the facility within one (1) week of the documentation cross-check required by 40 CFR §60.502(e)(3), or within three (3) weeks after the loading has occurred. **[Authority: 40 CFR §60.502(e)(4), §63.11088(a), and Table 2 of 40 CFR, Part 63,**

Table IV – 4

Subpart BBBBBB, Item 1(d)]

The Permittee shall submit to the Department semiannual compliance reports that include each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. **[Authority: 40 CFR §63.11088(f), §63.11095(a), and §63.11095(a)(2)]**
This report shall be submitted along with the semiannual monitoring report.

The Permittee shall submit to the Department upon request copies of certification test records from the leak-tight conditions tests required under COMAR 26.11.13.04A(3)(a). **[Authority: COMAR 26.11.13.05D(1)(b)]**

D. Control of VOC and HAP (Back Pressure and Leak Requirements)

The Permittee shall report all deviations from Indicator 1 and Indicator 2 of the CAM Plan requirements as specified in the CAM Plan for vapor line back pressure and equipment leaks. The Permittee shall submit these deviations with the semiannual monitoring report. **[Authority: See Indicator 1 and Indicator 2 of the CAM Plan, Table IV-5]**

The Permittee shall submit to the Department semiannual compliance reports that include the number of equipment leaks not repaired within 15 days after detection. **[Authority: 40 CFR §63.11088(f) and §63.11095(a)(3)]** These reports shall be submitted with the semiannual monitoring report.

E. Control of VOC and HAP (Design and Operational Requirements)

The vapor collection and control system is designed to operate as required. **[Authority: COMAR 26.11.02.09A]**

F. Control of VOC and HAP (Operational Requirements)

The Permittee shall submit records of the types and amounts of materials loaded in each of the five lanes of the loading rack to the Department upon request. **[Authority: ARMA Permit to Construct No. 003-9-0029 issued on April 11, 2006 and ARMA Permit to Construct No. 003-0309-9-0029 issued on October 3, 2011]**

Table IV – 4	
	The Permittee shall submit notifications specified in 40 CFR §63.9, as applicable. **[Authority: 40 CFR §63.11087(d), 40 CFR §63.11093(d), and 40 CFR §63.9]**

A permit shield shall cover the applicable requirements of the Clean Air Act that are listed in the table above for Emissions Unit EU-LR.

TABLE IV-5 CAM PLAN FOR THE VAPOR COMBUSTION UNIT (VCU)

Part 64 Requirement	**CAM Plan**
Vapor Combustor - VCU	**Indicator No. 1**
I. Indicator 64.4(a)(1)	Vapor Line Back Pressure
Monitoring Approach	Pressure Gauge
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as anytime the pressure gauge indicates greater than 18” of water and truck loading is still occurring. All pressure gauge readings greater than 18” water column shall be reported to the MDE in the required semi-annual monitoring report.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The back pressure is monitored using a portable pressure gauge which is placed on the vapor hose connection to the tanker truck.
B. Verification of Operational Status	Monthly visual check on each loading bay with manual log entry.
C. AQ/QC Practices and Criteria	Preventative maintenance is performed on the back pressure gauge three times per year. The back pressure gauge is calibrated or replaced at least once every five (5) years during the VRU performance test.
D. Monitoring Frequency	Monthly
E. Data Collection	Monthly visual reading with manual log entry.
F. Averaging Period	N/A

Part 64 Requirement	**CAM Plan**
Vapor Combustor - VCU	**Indicator No. 2**
I. Indicator 64.4(a)(1)	Equipment Leaks
Monitoring Approach	Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline will be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. The detection method will be sight, sound, or smell.
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as detection of a leak by sight, sound, or smell. An excursion will trigger an investigation, corrective action, and a reporting requirement. Leaks will be repaired within 15 days. All excursions and corrective actions taken shall be reported to the MDE in semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The terminal operations personnel will be trained on the procedures to detect, record, and initiate corrective actions.
B. Verification of Operational Status	N/A
C. QA/QC Practices and Criteria	The operations' personnel responsible for performing the monthly inspections will be trained on the procedures to follow. The terminal will maintain a record of employees trained to perform the inspections.
D. Monitoring Frequency	Monthly
E. Data Collection Procedures	Manual records of inspections, leaks found, and leaks repaired.
F. Averaging Period	N/A

Part 64 Requirement	**CAM Plan**
Vapor Combustor Unit--VCU	**Indicator No. 3**
I. Indicator 64.4(a)(1)	Presence of flame within the VCU stack.
Monitoring Approach	Pilot (flame) detector
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion is defined as a failure for the pilot detector to shutdown the VCU when there is no flame. All excursions shall be reported to the MDE in semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The pilot detector controls the operation of the VCU. When no pilot flame is detected, the VCU cannot start-up and if no flame is detected during operation, the VCU automatically shuts down and loading ceases.
B. Verification of Operational Status	The pilot detector is connected to an interlock system that ensures the VCU and loading rack cannot operate if no flame is detected.
C. QA/QC Practices and Criteria	Preventative maintenance is performed on the VCU three times per year. During each visit the following items are checked to ensure proper pilot operation: • Pull and clean pilot gas strainer. • Pull and clean assist gas strainer. • Check all indicator lights and sensors, replace if faulty. • Inspect spark ignition systems. • Ensure burner scanner is operating properly by blocking scanner and starting unit. Unit should shut down upon pilot flame failure.

	• Complete start-up procedure is checked.
D. Monitoring Frequency	Pilot detector operates continuously.
E. Data Collection Procedures	Results of inspections and preventative maintenance of the pilot operation are manually recorded and maintained on site.
F. Averaging Period	N/A

Part 64 Requirement	**CAM Plan**
Vapor Combustor Unit - VCU	**Indicator No. 4**
I. Indicator 64.4(a)(1)	Visible emissions observations during loading operation.
Monitoring Approach	Conduct visible emissions observations.
II. Indicator Range 64.4(a)(2) Reporting Threshold	An excursion occurs if visible emissions observed. All excursions will be reported to the MDE in semi-annual monitoring reports. An excursion will trigger an investigation, corrective action, and a reporting requirement. All excursions shall be reported to the MDE in semi-annual monitoring reports.
III. Performance Criteria 64.4(a)(3)	
A. Data Representativeness	The observer looks for visible emissions just above the exhaust outlet of the combustor.
B. Verification of Operational Status	N/A
C. QA/QC Practices and Criteria	The observers are trained on procedures in making an observation and record keeping requirements.
D. Monitoring Frequency	At least once per month, the Permittee shall observe the stack of the VCU for visible emissions. An operator familiar with the maintenance and operation of the VCU shall conduct each observation for a 6 minute period.

E. Data Collection Procedures	Results of observations will be manually recorded and maintained on site. Records will include date, time, and results of the observation.
F. Averaging Period	N/A

Table IV – 6	
6.0	**Emissions Unit Number(s)** Facility Wide Requirements
6.1	**Applicable Standards/Limits:** HAP and VOC Emissions Limitations A. Facility wide HAP emissions shall be less than 10 tons for any single HAP and 25 tons for the total combination of HAPs in any consecutive twelve (12) month period. **[Authority: COMAR 26.11.03.06C]** B. Total gasoline/ethanol throughput shall not exceed 560 million gallons in any consecutive twelve (12) month period and distillate throughput shall not exceed 100 million gallons in any consecutive twelve (12) month period, unless the Permittee demonstrates to the satisfaction of the Department, that non-attainment NSR requirements do not apply to the modification to the loading rack to allow blending butane with gasoline products. **[Authority: ARMA Permit to Construct No. 003-0309-9-0039 issued October 3, 2011]** C. The Permittee shall, at all times, operate and maintain any affected source including associated air pollution control equipment and monitoring equipment subject to the requirements of 40 CFR, Part 63, Subpart BBBBBB, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The Department will determine whether such operation and maintenance procedures are being used based on information available to the Department which may include monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **[Authority: 40 CFR §63.11085(a)]**

Table IV – 6	
6.2	**Testing Requirements:** HAP and VOC Emissions Limitations A. At least once per year, the Permittee shall test or have the fuel supplier test all fuels for HAP content including individual HAP speciation amounts. In lieu of the annual testing requirement, the Permittee may demonstrate compliance with the facility wide HAP limitations through the use of HAP content documentation and/or test data provided by the American Petroleum Institute, the U.S. EPA, or other sources approved by the Department. **[Authority: COMAR 26.11.03.06]** B. See Record Keeping and Reporting Requirements C. See Monitoring, Record Keeping, and Reporting Requirements.
6.3	**Monitoring Requirements:** HAP and VOC Emissions Limitations A. and B. See Record Keeping and Reporting Requirements. C. The Permittee shall perform monthly leak inspections of all equipment in gasoline service, as defined in 40 CFR §63.11100. For these inspections, detection methods incorporating sight, sound, and smell are acceptable. **[Authority: 40 CFR §63.11089(a)]**
6.4	**Record Keeping Requirements:** HAP and VOC Emissions Limitations A. The following records shall be kept on-site for at least five (5) years and shall be made available to the Department upon request: 1. Monthly records of facility wide HAP emissions; and 2. Annual HAP content test results or HAP content documentation and/or other test data from the American Petroleum Institute, the U.S. EPA, or other sources approved by the Department. **[Authority: COMAR 26.11.03.06C]** B. The Permittee shall maintain monthly records to document that total gasoline/ethanol throughput loaded into tank trucks for each consecutive twelve (12) months does not exceed 560 million gallons and distillate throughput loaded into tank trucks for each consecutive twelve (12)

Table IV – 6

months does not exceed 100 million gallons. **[Authority: ARMA Permit to Construct No. 003-0309-9-0029 issued on October 3, 2011]**

C. The Permittee shall:

1. Prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service to demonstrate compliance with the leak detection requirements under 40 CFR §63.11089. If the Permittee elects to implement an instrument program under §63.11089, the record shall include a full description of the program. **[Authority: 40 CFR §63.11094(d)]**

2. Use a log book to record the required monthly leak inspections. The log book shall be signed by the Permittee at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. **[Authority: 40 CFR §63.11089(b)]**

3. Record each detection of a liquid or vapor leak in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than five (5) calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except if there is a delay of repair. Delay of repair of leaking equipment is allowed if the repair is not feasible within 15 days. The Permittee shall provide in the semiannual report specified in 40 CFR §63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed. **[Authority: 40 CFR §63.11089(c) and (d)]**

   The Permittee shall record in the log book for each leak that is detected the following information: **[Authority: 40 CFR §63.11094(e)]**

   (a) The equipment type and identification number.

   (b) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell).

Table IV – 6	
	(c) The date the leak was detected, the date of each attempt to repair the leak, and reasons for any repair interval in excess of fifteen (15) days. (d) Repair methods applied in each attempt to repair the leak. (e) The expected date of successful repair of the leak if the leak is not repaired within 15 days. (f) The date of successful repair of the leak. 4. Maintain records of the following for at least five (5) years and shall make available to the Department upon request: (a) Records of the occurrence and duration of each malfunction of operation of the process equipment or the air pollution control and monitoring equipment. **[Authority: 40 CFR §63.11094(g)(1)]** (b) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR §63.11085(a), including corrective actions to restore manufacturing process and air pollution control and monitoring equipment to its normal or usual manner of operation. **[Authority: 40 CFR §63.11094(g)(2)]**
6.5	**<u>Reporting Requirements</u>:** <u>HAP and VOC Emissions Limitations</u> A. The Permittee shall submit to the Department, as part of the annual Emission Certification that is submitted to the Department by April 1 of each calendar year, facility wide HAP emissions and annual HAP content test results <u>or</u> HAP content documentation and/or other test data from the American Petroleum Institute, the U.S. EPA, or other sources approved by the Department. **[Authority: COMAR 26.11.02.19C, 19D, and COMAR 26.11.03.06]** B. The Permittee shall report incidences of excess emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, “Report of Excess Emissions and Deviations”. **[Authority: COMAR 26.11.03.06]**

Table IV – 6	
	C. The Permittee shall: 1. Submit notifications specified in 40 CFR §63.9, as applicable, in accordance with 40 CFR, Part 63, Subpart BBBBBB. **[Authority: 40 CFR §63.11093(d) and 40 CFR §63.9]** 2. Submit an excess emissions report to the Department at the same time the semiannual compliance report is submitted. The excess emissions report shall include the following information: **[Authority: 40 CFR §63.11095(b)]** For each occurrence of an equipment leak for which no repair attempt was made within five (5) days or for which repair was not completed within 15 days after detection: (a) The date on which the leak was detected. (b) The date of each attempt to repair the leak. (c) The reasons for the delay of repair. (d) The date of successful repair. **[Authority: 40 CFR §63.11095(b)(5)]** 3. The Permittee shall submit a semiannual report including the number, duration, and a brief description of each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the Permittee during a malfunction of an affected source to minimize emissions in accordance with 40 CFR §63.11085(a), including actions taken to correct a malfunction. The report shall be submitted as a part of the semiannual compliance report. The number of equipment leaks not repaired within 15 days after detection shall also be included in the semiannual compliance report. **[Authority: 40 CFR §63.11095(a)(3) and (d)]**

SECTION V INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

(1) No. 1 Fuel burning equipment using gaseous fuels or no. 1 or no. 2 fuel oil, and having a heat input less than 1,000,000 Btu (1.06 gigajoules) per hour;

The No. 2 fuel oil-fired boiler rated at 0.196 million BTU per hour for office building space heat is subject to the following requirements:

COMAR 26.11.09.05A(2), which establishes that the Permittee may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers.

Exceptions: COMAR 26.11.09.05A(2) does not apply to emissions during load changing, soot blowing, start-up, or adjustments or occasional cleaning of control equipment if:

(d) The visible emissions are not greater than 40 percent opacity; and

(e) The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period.

(2) No. 2 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;

EU-20: One (1) 550-gallon heating oil, horizontal storage tank.
EU-207L: One (1) 691,812-gallon distillate storage tank equipped with a cone roof.

(3) No. 1 Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;

EU-8: one (1) 225-gallon sample return tank associated with the butane blending project. Note: this emission unit was

previously a 300-gallon, fuel additive, horizontal storage tank which was replaced by a square storage tank in 2011.

(4) No. 8 The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;

EU-7: One (1) 300-gallon, fuel additive, horizontal storage tank.
EU-9: One (1) 2,000-gallon, fuel additive, horizontal storage tank.
EU-13: One (1) 2,000-gallon, slop refined petroleum products, horizontal storage tank.
EU-14: One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.
EU-18: One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.
EU-19: One (1) 550-gallon, slop refined petroleum products, horizontal storage tank.
EU-24: One (1) 300-gallon, fuel additive, horizontal storage tank.
EU-25: One (1) 550-gallon, fuel additive, horizontal storage tank.

The Permittee shall maintain records of the monthly throughput of fuel additive stored in EU-9. **[Authority: ARMA Permit to Construct No. 02-9-0599 issued on November 5, 1997]**

(5) No. 1 The storage of butane, propane, or liquefied petroleum, or natural gas.

EU-12: One (1) 60,000-gallon pressurized butane bullet installed in 2011. Note: EU-12 was previously a 12,000-gallon, slop refined petroleum products, horizontal storage tank which was taken out of service in 1999 and demolished in August of 2011.

(6) No. 1 Laboratory fume hoods and vents.

SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

The Permittee is subject to the following State-only enforceable requirements:

(1) Applicable Regulations:

A. COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

B. COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.

C. COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health

(2) Operating, Testing and Monitoring Conditions:

None

(3) Record Keeping and Reporting:

The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

A. A statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid.

OR

B. A revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.